

A A A | Low Graphics Version

Current Agency
Entire County

Search...



OC PUBLIC WORKS

WATER POLLUTION
HOTLINE

PUBLIC EDUCATION

WATERSHED
PROGRAMSRAIN / WATER
QUALITY DATA

DOCUMENTS

CONTACT US

[OC Watersheds](#)

...

[PEA Reports](#)

2011-12 Orange County Stormwater Program Unified PEA



PEA REPORTS

[PEA Reports Home](#)2011-12 Orange County
Stormwater Program Unified PEASorry, this page has moved!
Please click [here](#) to go to the new location.

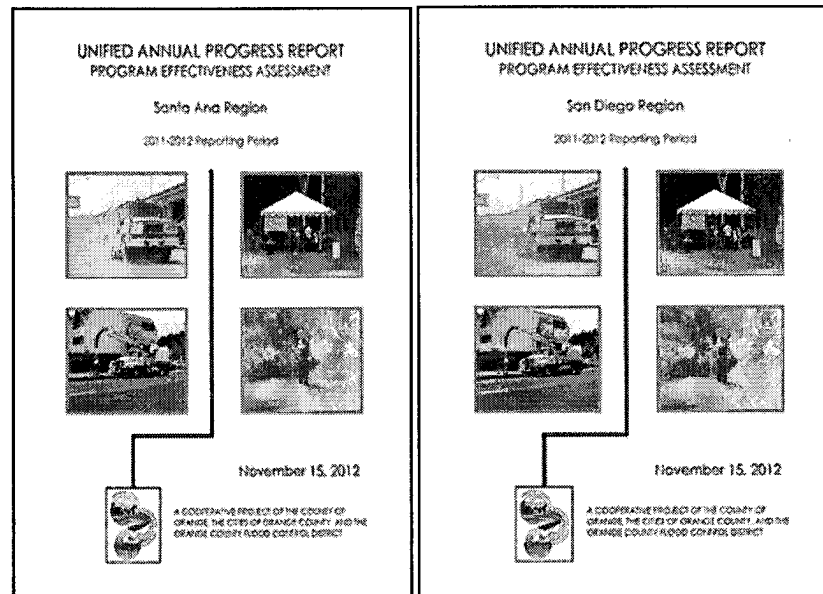
2011-12 Orange County Stormwater Program Unified PEA

POPULAR

[BMP Fact
Sheets](#)[Documents for
Public Review](#)[Drainage Area
Management
Plan](#)[Educational
Brochures](#)[FAQ](#)[Kids Corner](#)[Rain Data](#)[Water Quality
Management
Plan](#)

RESOURCES

TRANSLATE

[Español](#)[한국어](#)[Tiếng Việt](#)

ABOUT US

PUBLIC EDUCATION

DOCUMENTS FOR REVIEW

STORM MAP

WATER POLLUTION HOTLINE

EXECUTIVE COMMITTEE

- [Table of Contents: \[Santa Ana Region\]](#)
- [Table of Contents: \[San Diego Region\]](#)
- [Acronyms](#)
- [Executive Summary \[Santa Ana Region\]](#)
- [Executive Summary \[San Diego Region\]](#)
- [Certification Page](#)
- [Section C-1: Introduction](#)
- [Section C-2: Program Management](#)
- [Section C-3: Plan Development](#)
- [Section C-4: Legal Authority](#)
- [Section C-5: Municipal Activities](#)
- [Section C-6: Public Education](#)
- [Section C-7: New Development/Significant Redevelopment](#)
- [Section C-8: Construction](#)
- [Section C-9: Existing Development](#)
- [Section C-10: Illegal Discharges/Illicit Connections \(ID/IC\)](#)
- [Section C-11 \[Santa Ana Region\]: Santa Ana Region Water Quality Monitoring Summary & Analyses](#)
 - [Section C-11 Attachment 1 \[Santa Ana Region\]: Maps](#)
 - [Section C-11 Attachment 2 \[Santa Ana Region\]: Data](#)
 - [Section C-11 Attachment 3 \[Santa Ana Region\]: Methodology](#)
 - [Section C-11 Attachment 4 \[Santa Ana Region\]: Quality Assurance/Quality Control](#)
- [Section C-11 \[San Diego Region\]: San Diego Region Water Quality Monitoring Summary](#)
- [Section C-11 \[San Diego Region\]: San Diego Region Water Quality Monitoring Tables and Figures](#)
 - [Section C-11 Attachment 1 \[San Diego Region\]: Maps](#)
 - [Section C-11 Attachment 2 \[San Diego Region\]: Data](#)
 - [Section C-11 Attachment 3 \[San Diego Region\]: Methodology](#)
 - [Section C-11 Attachment 4 \[San Diego Region\]: Quality Assurance/Quality Control](#)
- [Section C-12 \[Santa Ana Region\]: Santa Ana Regional Watersheds](#)
- [Section C-12 \[San Diego Region\]: San Diego Regional Watersheds](#)
- [Section C-13: Recommended Program Changes](#)

MY OC [Login](#) | [Register](#) ›

Hall of Administration
333 W. Santa Ana Blvd.
Santa Ana, CA 92701
714.834.5400

Navigation

[OC Home](#)
[About the County](#)
[Agencies & Departments](#)
[Business](#)
[How Do I](#)
[Residents](#)
[Services](#)

Quick Links

[Acceptable Use](#)
[Accessibility](#)
[Contact the County](#)
[Disclaimer](#)
[Sitemap](#)

Resources

[Chambers of Commerce](#)
[Federal Government](#)
[General Information](#)
[Orange County Cities](#)
[Related Government Agencies](#)
[School Districts](#)
[State Government](#)
[Visitor Bureaus](#)

Connect With OC

Making Orange County a safe, healthy, and fulfilling place to live, work, and play, today and for generations to come, by providing outstanding, cost-effective regional public services.

C-9.0 EXISTING DEVELOPMENT

C-9.1 Introduction

Stormwater discharges from commercial and industrial facilities can become contaminated when material management practices allow exposure to stormwater and/or there is commingling of runoff with wastes. The purpose of **DAMP Section 9.0** is to provide a programmatic framework for the regulatory oversight of activities in commercial and industrial areas. Through inspections, outreach and requiring compliance with water quality ordinances, the Permittees are able to pro-actively address the quality of urban and stormwater runoff from industrial and commercial facilities. **DAMP Section 9.0** also provides a programmatic framework, emphasizing education and outreach approaches, for addressing activities in residential areas.

C-9.2 Accomplishments

9.2.1 Model Industrial/Commercial Program

The Model Industrial/Commercial Program was first implemented in 2002-03. It transformed the Permittees oversight of commercial and industrial facilities/activities by establishing a formal inspection program where previously there had been a series of notifications and inspections initiated by complaints. The Model Industrial/Commercial Program requires the Permittees to:

- Identify and inventory facilities/activities with the potential to discharge pollutants:

During 2011-12, 5,620 industrial facilities were identified and inventoried (**Table C-9.1; Figure C-9.1**) and 9,354 commercial facilities were identified and inventoried (**Table C-9.2; Figure C-9.2**).

- Prioritize facilities based upon water quality threat and receiving water sensitivity (Santa Ana Region requirement):

The Permittees' industrial inventories comprised a total of 783 high priority, 787 medium priority and 4,033 low priority industrial facilities in the reporting period (**Table C-9.1; Figure C-9.1**). The Permittees' commercial inventories comprised a total of 2,770 high priority, 1,859 medium priority and 4,669 low priority commercial facilities in the reporting period (**Table C-9.2; Figure C-9.2**).

- Establish Model Maintenance Procedures:

Twenty-four (24) model BMP fact sheets have been prepared (available at <http://www.ocwatershed.com/IndustrialCommercialBusinessesActivities.aspx>) which include a description of specific minimum source control BMPs for common industrial and commercial activities that may discharge pollutants.

SECTION C-9.0, EXISTING DEVELOPMENT

Each fact sheet contains the following sections:

- Targeted water quality constituents of concern;
- Specified minimum BMPs;
- Training, and
- References and resources

In 2011-12, the Permittees also identified BMP fact sheets in need of an update and began making revisions. Updated BMP fact sheets will be made available on the Orange County Stormwater Program website in the current reporting period.

- Conduct inspections and monitoring to ensure that commercial and industrial facilities are minimizing their impacts on the environment:

In 2011-12, the Permittees reported the status of BMP implementation at 2,216 industrial facilities (**Table C-9.3; Figure 9.6**) and 4,642 commercial facilities (**Table C-9.4; Figure 9.7**) for a total of 6,858 facilities (**Figure C-9.4**).

- Develop and implement a program to address mobile businesses:

Implementation of the Mobile Business Pilot Program commenced in 2010-11, with the development of an online, countywide inventory and enforcement database, and use of the database continued during the reporting period.

- Conduct inspections of food service establishments:

HCA conducts routine inspections of food service establishments for compliance with the California Uniform Retail Food Facilities Law. The HCA inspectors identify NPDES issues during these inspections and they are forwarded to the respective Permittees and addressed by Permittee staff.

For the 2011-12 reporting period, 10,399 food facility inspections were conducted, during which 2,665 stormwater management issues were noted (**Table C-9.5**).

- Undertake Non-compliance Notification and Enforcement:

Enforcement for the industrial and commercial component of the Existing Development Program is the responsibility of individual Permittees. Each Permittee has several different levels of enforcement to choose from for different types of situations. This includes - from least severe to most severe - issuance of an educational letter, a notice of non-compliance, an administrative compliance order, a cease and desist order, or a misdemeanor/infracton.

The Permittees reported a total of 378 enforcement actions against industrial facilities (**Table C-9.6**) and 863 enforcement actions against commercial facilities during the reporting period (**Table C-9.7**) for a total of 1,241 enforcement actions (**Figure C-9.5**).

SECTION C-9.0, EXISTING DEVELOPMENT

- Participate in Training:

To assist municipal staff in implementing the Existing Development Program for industrial and commercial facilities, three training modules available to the Permittees. These modules are:

1. Existing Development Program Management Module (targeting jurisdictional program coordinators and providing guidance regarding management of an inspection program;
2. Field Implementation of Existing Development Program Module (targeting inspectors and providing guidance on conducting inspections);
3. Existing Development Program Training – Industrial Stormwater Monitoring Module.

In addition to the training modules, the NPDES Inspection Sub-Committee also provided training on various subjects relevant to the Existing Development and ID/IC programs. This sub-committee meets quarterly to provide training to inspectors and others on issues related to spill response, inspection and enforcement. It also serves as a forum for the coordination and discussion of ongoing difficult or new enforcement, investigation, or enforcement issues and to profile cases or incidents.

- Conduct Education and Outreach:

A number of education and outreach efforts, conducted under the overall public education element of the Program (see **DAMP Section 6.0**), directly supported implementation of the Model Industrial/Commercial Program. A full discussion of education and outreach efforts is presented in **Section C-6.0**.

All outreach materials also include the countywide hotline reporting number (1-877-89SPILL) and reference the www.ocwatersheds.com website, allowing the public to report any observed spills or illegal discharges.

C-9.2.2 Model Residential Program

The Model Residential Program was developed to further reduce pollutants potentially released into the environment from residential activities, including efforts to reduce over-watering. The residential program encourages use of pollution prevention practices as the most effective method to protect receiving water quality. The Model Residential Program requires the Permittees to:

- Develop a source identification procedure and prioritize residential areas based on proximity to Environmentally Sensitive Areas (ESAs) within the Permittee's jurisdiction (San Diego Region only).
- Identify BMPs most appropriate for each area, based on residential activities:

SECTION C-9.0, EXISTING DEVELOPMENT

Eight (8) model BMP fact sheets have been prepared (available at <http://ocwatersheds.com/ResidentialActivities.aspx>) which include a description of specific pollution-prevention activities for residential areas.

Each fact sheet contains the following sections:

- Targeted pollutants;
 - Required activities;
 - Recommended activities
- Facilitate the proper collection of household hazardous wastes

Four (4) Household Hazardous Waste Collection Centers, operated by the County of Orange Waste and Recycling Agency, are located at the following sites throughout the county:

- 1071 N. Blue Gum Street, Anaheim, CA 92806
 - 17121 Nichols Street - Gate 6, Huntington Beach, CA 92647
 - 6411 Oak Canyon, Irvine, CA 92618
 - 32250 La Pata Avenue, San Juan Capistrano, CA 92675
- Implement a program to control pollutant discharges from common interest areas (CIAs) and areas managed by homeowner associations (HOAs)

During the reporting period, Permittees in the San Diego Region implemented independent programs addressing pollutant discharges from CIAs/HOAs. Per Section XI.4 of the Santa Ana Permit, the Santa Ana Region Permittees developed a pilot program in 2010-11 to educate CIAs/HOAs and have begun implementation of the pilot program.

Additionally, nineteen (19) model BMP fact sheets have been prepared (available at <http://ocwatersheds.com/CommonInterestActivities.aspx>) which include a description of specific pollution-prevention activities for CIAs/HOAs.

In 2011-12, the Permittees also identified BMP fact sheets in need of an update and began making revisions. Updated BMP fact sheets will be made available on the Orange County Stormwater Program website in the current reporting period.

- Conduct public outreach and education:

A number of education and outreach efforts, conducted under the overall public education element of the Program, directly supported implementation of the Model Residential Program. A full discussion of education and outreach efforts is presented in **Section C-6.0**.

All outreach materials also include the countywide hotline reporting number (1-877-89SPILL) and reference the www.ocwatersheds.com website, allowing residents to report any observed spills or illegal discharges.

SECTION C-9.0, EXISTING DEVELOPMENT

C-9.3 Assessment

The current and potential Program Effectiveness Assessment Outcome Levels for the current program are summarized in **Table C-9-8 (Industrial/Commercial)** and **Table C-9.9 (Residential)**.

C-9.3.1 Model Industrial/Commercial Program

Inventories: Completing the inventory of industrial and commercial facilities has been problematic for some jurisdictions since the Standard Industrial Classification codes on the business licenses (the primary source of this information for those jurisdictions with a business license program) have been incorrectly provided by businesses.¹ In addition, inventorying commercial facilities is extremely difficult because they are numerous, often transitory, and can only be identified through site visits. These issues continue to be a source of difficulty for the Permittees.

Prioritization (Santa Ana Region only): Commercial and industrial facilities must be classified as high, medium, or low priority to determine the frequency of inspection. The DAMP details a risk and receiving water sensitivity based point system for classification. The Permit further mandates that a minimum of 10% of facilities in the commercial inventory be prioritized as high priority and a minimum of 20% of facilities in the commercial inventory be prioritized as medium priority.

Inspection frequency in the San Diego Region is not dependent on prioritization of facilities; rather, the Permit requires a minimum of 20% of the total industrial and commercial facilities in the facility inventory be inspected annually.

Headline Indicator – Prioritization of Facilities (Industrial Facilities): For 2011-12, 5,620 industrial facilities were inventoried, of which 14% were ranked high priority. For 2010-11, 6,081 industrial facilities were prioritized, of which 13% were ranked as high priority. These figures compare to 2010-11 (6,081 industrial facilities were inventoried, 13% of which were ranked as high priority); 2009-10 (6,452 industrial facilities were inventoried, 12% of which were ranked as high priority); 2008-09 (2,328 industrial facilities were inventoried, 32% of which were ranked as high priority); and, 2007-08 (3,769 industrial facilities were inventoried, 21% of which were ranked as high priority) (**Table C-9.1; Figure C-9.1**).

¹ The Notice of Intent (NOI) form attached to the Draft Industrial General Permit (February 2005) and the SWRCB's NOI processing system have been modified to accept both Standard Industrial Classification (SIC) codes and North American Industrial Classification System (NAICS) codes. The USEPA has indicated it intends to incorporate the NAICS codes into the storm water regulations but has not yet done so. The Proposed 2006 Multi-Sector General Permits for Stormwater Discharges Associated with Industrial Activity (MSGP) contains a note that "a complete list of SIC Codes (and conversions from the newer North American Industry Classification System [NAICS]) can be obtained from the Internet at www.census.gov/epcd/www/naics.html or in paper form from various locations in the document titled Handbook of Standard Industrial Classifications, Office of Management and Budget, 1987."

- ☒ Level 1: Documenting Stormwater Program Activities
- ☒ Level 3: Changing Behavior

Headline Indicator – Prioritization of Facilities (Commercial Facilities): For 2011-12, 9,354 commercial facilities were inventoried, of which 30% were ranked as high priority. These figures compare to 2010-11 (12,354 commercial facilities were inventoried, of which 24% were ranked as high priority); 2009-10 (17,497 commercial facilities were inventoried, of which 25% were ranked as high priority); 2008-09 (18,513 commercial facilities were inventoried, of which 25% were ranked as high priority); and, 2007-08 (21,961 commercial facilities were inventoried, of which 17% were ranked as high priority) (Table C-9.2; Figure C-9.2).

- ☒ Level 1: Documenting Stormwater Program Activities
- ☒ Level 3: Changing Behavior

Both Permits require a minimum number of commercial facilities be prioritized and/or inspected, but specifies that food facilities not be included. In order to evaluate countywide compliance with these requirements, the total number of commercial facilities reported since 2010-11 does not include food facilities. This may account for the large decrease in total number of commercial facilities from 2009-10 to 2011-12; however, since food facilities were not required to be included in Santa Ana Permittee inventories until the fourth term, the more likely explanation for the decrease in total number of commercial facilities over prior years may be poor economic conditions during this time frame. The trending increase in commercial facilities prioritized as high may be attributed to interim requirements of the fourth-term Santa Ana Region Permit which require a minimum of 10% of each Permittee's commercial facility inventory be prioritized as high and a minimum of 20% of each Permittee's commercial facility inventory be prioritized as medium. Additionally, since the San Diego Region Permit does not require prioritization, the inclusion of commercial facilities in South Orange County may affect the overall trend. This and other areas of divergence between permit requirements in each region of the County may necessitate revisions to the data collection process in the future.

Per Section X.2 of the Santa Ana Permit, the Permittees have developed an alternate system for prioritization of commercial facilities, originally submitted to the Santa Ana Regional Board on May 22, 2010. The proposal is undergoing revisions to address comments received from Regional Board staff.

The trend in total number of industrial facilities prior to 2009-10 appeared to be on a steep downward trend; however, as was noted in the 2009-10 annual report, the seeming decline in industrial facilities appeared to be attributed to a misunderstanding between staff of whether to include the total number of facilities in the inventory or the total

SECTION C-9.0, EXISTING DEVELOPMENT

number of facilities that were inspected during the reporting period. Since clarification was provided, the total number of industrial facilities has remained relatively stable, albeit on a much slower downward trend. The decrease in total number of industrial facilities during 2009-12 may, like the decline in commercial facilities, be due to poor economic conditions. The percentages of industrial facilities prioritized as high, medium or low appears to have remained relatively stable since the 2009-10 reporting period.

Inspection: The Permittees generally conduct two types of inspections: compliance inspections and follow-up inspections. Should an inspected site demonstrate non-compliance, inspection frequency must be increased as specified in the Permits until compliance is achieved.

Headline Indicator – Number of BMPs Implemented (Industrial Facilities): In 2011-12, 1,891 (85%) of 2,216 industrial facilities inspected were determined to have fully implemented BMPs. This figure compares to 2010-11 (89% of 2,350 industrial facilities inspected were determined to have fully implemented BMPs); 2009-10 (82% of 1,690 industrial facilities inspected were determined to have fully implemented BMPs); 2008-09 (88% of 2,159 industrial facilities inspected were determined to have fully implemented BMPs); and, 2007-08 (83% of 1,821 industrial facilities were determined to have fully implemented BMPs) (Table C-9.3; Figure C-9.6).

- ☒ Level 1: Documenting Stormwater Program Activities
- ☒ Level 3: Changing Behavior

Headline Indicator – Number of BMPs Implemented (Commercial Facilities): In 2011-12, 3,867 (83%) of 4,642 commercial facilities inspected were determined to have fully implemented BMPs. This figure compares to 2010-11 (81% of 5,073 commercial facilities inspected were determined to have fully implemented BMPs); 2009-10 (78% of 4,394 commercial facilities inspected were determined to have fully implemented BMPs); 2008-09 (82% of 6,345 commercial facilities inspected were determined to have fully implemented BMPs); and, 2007-08 (83% of 7,260 commercial facilities inspected were determined to have fully implemented BMPs) (Table C-9.4; Figure C-9.7).

- ☒ Level 1: Documenting Stormwater Program Activities
- ☒ Level 3: Changing Behavior

The percentage of full BMP implementation at both industrial and commercial facilities has, for the past four years, remained close to eighty percent. Independent of minor fluctuations between years, this overall trend supports a change in behavior of facility operators since the Industrial/Commercial program was developed in 2002-2003.

Headline Indicator – Food Facility Inspections: For the 2011-12 reporting period, 10,399 food facility inspections were conducted, during which 2,665 NPDES issues were reported. These figures compare to 2010-11 (8,251 food facility inspections were conducted and 2,240 NPDES issues reported); 2009-10 (7,897 food facility inspections were conducted and 2,657 NPDES issues reported); 2008-09 (25,027 food facility inspections were conducted and 2,096 NPDES issues reported); and, 2007-08 (24,231 food facility inspections were conducted and 2,431 NPDES issues reported) (Table C-9.5 and Figure C-9.8).

- ☒ Level 1: Documenting Stormwater Program Activities
- ☒ Level 3: Changing Behavior

HCA annually conducts three inspections of each food service establishment for compliance with the California Uniform Retail Food Facilities Law. All three inspections addressed the condition of refuse containers and trash bin enclosures and one inspection addressed other NPDES issues; therefore, during the Third-Term Permit, the Permittees recorded all three inspections conducted by HCA as NPDES inspections. However, the Fourth-Term Permits now specify that all NPDES issues (oil and grease disposal, trash bin enclosures, washwater discharges and fats, oils and grease (FOG)) be addressed annually. As a result, during 2009-10, only one of the three food facility inspections conducted by HCA was recorded as a routine NPDES inspection.

In the 2010-11 Annual Report, the Permittees committed to meeting with HCA to determine potential sources of error in NPDES inspection tracking. A meeting was held on January 25, 2012 at which time it was determined that the primary source of error resulted from the inclusion of “pre-packaged” facilities in the HCA food facility data that is shared with the Permittees, which, due to HCA staffing shortages, were not being inspected at an annual frequency. The 2003 and 2007 DAMPs define food facilities as “those fixed facilities that process unpackaged food that have been identified by the HCA.” Therefore, the inclusion of pre-packaged food facilities that were not being inspected annually had resulted in a lesser number of inspections reported in 2009-10 and 2010-11 than total number of food facilities. A further complication is that HCA inspections are conducted on a calendar year, whereas the Permittees report on a fiscal year. This difference was found to have a minimal impact on the number of inspections being conducted, as was reported in the 2010-11 Annual Report, but may likely be the source of any year-to-year fluctuations.

The Permittees have also committed to HCA staff to provide refresher training on NPDES issues specific to food facilities in the upcoming reporting period.

2012-13 Program Focus:

- Provide refresher training to HCA staff on NPDES issues specific to food facilities in the 2012-13 reporting period.

SECTION C-9.0, EXISTING DEVELOPMENT

Mobile Businesses: The Mobile Business Pilot Program was developed during the 2009-10 reporting period and has been implemented since 2010-11.

An online, countywide inventory and enforcement database was developed in the 2010-11 reporting period and is widely used by Permittees in both the Santa Ana and San Diego regions. The database allows Permittees to update the inventory with mobile businesses found to operate within their jurisdiction, as well as enter and track enforcement actions in their jurisdiction and countywide.

A mass-mailing notification was distributed in June 2012 to all mobile detailing businesses in the countywide inventory in conjunction with an outreach workshop held on June 27, 2012. The notification included a workshop flier and mobile detailing brochure. More information on the workshop is included in **Section C-6.0**. In 2012-13, the Permittees will distribute a similar notification to all surface cleaner / pressure washing mobile businesses in the countywide inventory in conjunction with an outreach workshop to be held during the reporting period.

Also in 2011-12, the Permittees developed a self-certification quiz form for inclusion on the Orange County Stormwater Program public education website. However, use of the quiz has been delayed by the County transitioning to a new content management web system. The transition is expected to be completed in January 2013.

2012-13 Program Focus:

- Contact surface cleaner / power washing mobile businesses and provide information on source control and BMPs in conjunction with an outreach workshop.
- Evaluate the ability to include the self-certification quiz form on the Orange County Stormwater Program public education website.

Enforcement: Permittees are required to use a progressive enforcement approach and initiate enforcement actions where commercial and industrial facilities are found to be out of compliance. In general, specific facilities that are repeat offenders are identified through active database inventories and, in most cases, progressive enforcement is used to bring repeat offenders into compliance.

Headline Indicator – Number and Level of Enforcement Actions (Industrial Facilities): The Permittees reported a total of 378 enforcement actions against industrial facilities during the 2011-12 reporting period. This figure compares to a reported total of 277 enforcement actions against industrial facilities during 2010-11; 159 enforcement actions against industrial facilities during 2009-10; 81 enforcement actions against industrial facilities during 2008-09; and, 201 enforcement actions against industrial facilities during 2007-08 (Table C-9.6).

- ☒ Level 1: Documenting Stormwater Program Activities
- ☒ Level 3: Changing Behavior

Headline Indicator – Number and Level of Enforcement Actions (Commercial Facilities): The Permittees reported a total number of 863 enforcement actions against commercial facilities during the 2011-12 reporting period. This figure compares to a reported total of 814 enforcement actions against commercial facilities during 2010-11; 569 enforcement actions against commercial facilities during 2009-10; 779 enforcement actions against commercial facilities during 2008-09; and, 987 enforcement actions against commercial facilities during 2007-08 (Table C-9.7).

- ☒ Level 1: Documenting Stormwater Program Activities
- ☒ Level 3: Changing Behavior

Although the year-to-year comparisons for 2007-08 to 2009-10 showed an overall decrease in enforcement actions, enforcement actions against both industrial and commercial facilities increased during 2010-11 to 2011-12. Given the relatively consistent BMP implementation over the past five years, there is no conclusion that can be drawn from this increase in enforcement actions.

Training: The Permits require that staff is adequately trained. In response, the Permittees will new training modules during the upcoming reporting period supportive of the specified expertise and technical competencies established for individuals in the authorized inspector position. These modules include:

- Existing Development Program Management
- Commercial/Industrial/Municipal Inspector Field Implementation
- Food Facility Inspector
- Municipal Facility Model Maintenance Procedures

2012-13 Program Focus:

- Develop new training modules supportive of the specified expertise and technical competencies established for individuals in the *Authorized Inspector* and *Commercial/Industrial/Municipal Inspector* positions.

C-9.3.2 Model Residential Program

Identification and Inventory: The San Diego Region Permittees have identified high priority areas and activities as defined in the Permit.

BMP Implementation: The San Diego Region Permittees have identified minimum BMPs for high-priority areas and activities and continue to identify, as necessary, additional controls. The Santa Ana Region Permittees have identified polluting areas and activities and have developed BMP fact sheets which address these activities.

Household Hazardous Waste Collection: The Permittees have identified the household hazardous waste collection centers that are operated by the County of Orange Waste and Recycling Agency in the countywide public education brochure, "Proper Disposal of Household Hazardous Waste."

Enforcement and Reporting: The Permittees enforce their stormwater ordinances for all residential areas and activities as necessary to maintain Permit compliance.

Common Interest Areas/Homeowner Associations (CIAs/HOAs): Permittees in the Santa Ana Region developed a CIA/HOA pilot program in 2010-11, and have since coordinated with the University of California Cooperative Extension (UCCE) to outreach to CIAs/HOAs throughout the County. Permittees in the San Diego Region have implemented individual CIA/HOA programs since the Third-Term permits; assessment of these programs may be found in the individual Permittee Performance Effectiveness Assessments (PEAs).

2012-13 Program Focus:

- Continue implementation of the Santa Ana Region CIA/HOA Pilot Program in 2012-13.

C-9.4 Summary

The Fourth Term Permits have required the Permittees to continue implementation of the Model Industrial/Commercial Program, to develop a program specifically aimed at mobile businesses, and, in the Santa Ana Region, develop a program to outreach to CIAs/HOAs. Since permit adoption, the Permittees have worked to develop, and are now implementing the new programs. Long-term trends indicate that the Model Industrial/Commercial Program has been successful, and most facilities are not only

SECTION C-9.0, EXISTING DEVELOPMENT

aware of BMP requirements, but are consistently found to be implementing appropriate BMPs. However, due to differing permit requirements between Santa Ana and San Diego Regions, not all of the data that is reported can be evaluated across the two regions in the same way. In 2012-13, the Permittees will consider ways to improve trend analysis so that it is better reflective of the differences between the two regions, while still identifying countywide trends.

SECTION C-9.0, EXISTING DEVELOPMENT

Table C-9.1: Countywide Industrial Inventory & Prioritization: Comparison of 2007-08, 2008-09, 2009-10, 2010-11, and 2011-12

PERMITTEE	HIGH 2007-08	HIGH 2008-09	HIGH 2009-10	HIGH 2010-11	HIGH 2011-12	MEDIUM 2007-08	MEDIUM 2008-09	MEDIUM 2009-10	MEDIUM 2010-11	MEDIUM 2011-12	LOW 2007-08	LOW 2008-09	LOW 2009-10	LOW 2010-11	LOW 2011-12	TOTAL 2007-08	TOTAL 2008-09	TOTAL 2009-10	TOTAL 2010-11	TOTAL 2011-12
Aliso Viejo	2	2	3	3	3	0	1		0	0	1	0	39	39	39	3	3	42	42	42
Anaheim	146	146	150	147	130	76	25	58	46	13	839	153	1,166	1,057	1,070	1,061	324	1,374	1,250	1,213
Brea	21	16	16	14	12	0	19	24	23	20	0	33	25	28	27	21	68	65	65	59
Buena Park	161	118	109	121	112	53	9	44	44	56	40	1	63	96	101	254	128	216	261	269
Costa Mesa	72	26	27	28	28	33	1	5	6	6	0	6	230	239	250	105	33	262	273	284
Cypress	3	3	8	7	8	17	1	16	16	16	3	0	29	29	28	23	4	53	52	52
Dana Point	0	0	0	0	0	0	2	2	2	2	0	0	0	0	0	0	2	2	2	2
Fountain Valley	7	8	22	8	10	50	42	21	20	14	0	0	8	21	23	57	50	51	49	47
Fullerton	49	39	50	39	44	62	30	67	58	68	79	149	256	219	196	190	218	373	316	308
Garden Grove	37	37	42	46	46	30	47	71	80	149	165	60	255	194	96	232	144	368	320	291
Huntington Beach	29	26	36	42	39	29	9	67	98	95	391	15	217	198	199	449	50	320	338	333
Irvine	48	58	74	73	66	43	9	42	36	34	48	301	401	449	458	139	368	517	558	558
La Habra	13	14	14	14	14	90	90	56	30	30	290	280	156	82	110	393	384	226	126	154
La Palma	4	4	4	4	4	1	5	6	6	7	5	2	9	9	6	10	11	19	19	17
Laguna Beach	0	0	0	0	NA	0	6	15	8	NA	0	0	0	0	NA	0	6	15	8	17
Laguna Hills	1	0	1	1	1	0	0	0	0	0	0	0	0	0	0	1	0	1	1	1
Laguna Niguel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Laguna Woods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Lake Forest	8	10	2	2	1			8	8	8			0	0	0	8	10	10	10	9
Los Alamitos	5	5	4	DNR	DNR	0	0	51	DNR	DNR	0	0	26	DNR	DNR	5	5	81	DNR	DNR
Mission Viejo	4	3	3	3	3			31	0	0			56	26	26	4	3	90	29	29
Newport Beach	12	12	8	13	12	0	0	0	1	2	0	0	0	0	0	12	12	8	14	14
Orange	63	58	56	56	58	143	5	105	80	71	317	10	334	355	218	523	73	495	491	347
Placentia	3	13	DNR	DNR	DNR		0	DNR	DNR	DNR	3	47	DNR	DNR	DNR	6	60	DNR	DNR	DNR
R S Margarita	2	2	2	2	2	0	0	0	0	0	0	0	0	30	30	2	2	2	32	32
San Clemente	0	0	2	2	3				0	0				0	0	0	0	2	2	3
San Juan Capistrano	1	1	1	1	DNR	19	19	19	19	DNR	0	0	0	0	DNR	20	20	20	20	DNR
Santa Ana	110	98	111	101	120	2	0	263	258	102	1	1	1,093	1,095	983	113	99	1,467	1,454	1,205
Seal Beach	2	2	3	4	3	0	0	0	0	0	0	0	2	2	3	2	2	5	6	6
Stanton	16	16	14	17	19	17	0	6	15	17	11	13	141	101	100	44	29	161	133	136
Tustin	9	10	7	6	12	3	70	32	31	28	3	51	59	61	44	15	131	98	98	84
Villa Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Westminster	7	6	7	7	7	6	6	5	1	1	0	6	13	14	13	13	18	25	22	21
Yorba Linda	1	0	10	11	11	39	41	48	50	48	1	7	3	6	5	41	48	61	67	64
County of Orange	15	15	15	15	15	0	0	0	0	0	8	8	8	8	8	23	23	23	23	23
TOTALS	851	748	801	787	783	713	437	1,062	936	787	2,205	1,143	4,589	4,358	4,033	3,769	2,328	6,452	6,081	5,620

DNR = Data Not Reported - See Individual PEA

N/A = Not Applicable

SECTION C-9.0, EXISTING DEVELOPMENT

Table C-9.2: Countywide Commercial Inventory & Prioritization: Comparison of 2007-08, 2008-09, 2009-10, 2010-11, and 2011-12

PERMITTEE	HIGH 2007-08	HIGH 2008-09	HIGH 2009-10	HIGH 2010-11	HIGH 2011-12	MEDIUM 2007-08	MEDIUM 2008-09	MEDIUM 2009-10	MEDIUM 2010-11	MEDIUM 2011-12	LOW 2007-08	LOW 2008-09	LOW 2009-10	LOW 2010-11	LOW 2011-12	TOTAL 2007-08	TOTAL 2008-09	TOTAL 2009-10	TOTAL 2010-11	TOTAL 2011-12
Alliso Viejo	77	76	78	78	78	27	27	37	37	37	15	16	16	16	16	119	119	131	131	131
Anaheim	52	60	177	165	127	200	232	371	326	249	217	235	1,161	1,147	869	469	527	1,709	1,640	1,245
Brea*			16	17	19	225	193	99	33	30	83	85	137	114	90	308	278	252	164	139
Buena Park		238	254	271	263		14	66	54	68		1	77	80	111	0	253	397	405	442
Costa Mesa	1	12	78	81	69	836	80	151	155	125	107	403	515	540	432	944	495	744	776	626
Cypress	2	2	23	22	24	82	81	73	50	45	250	250	265	155	140	334	333	361	227	209
Dana Point	135	144	127	68	64	20	21	21	0	0	1	1	10	0	0	156	166	158	68	84
Fountain Valley**	22	55	14	13	10		10	25	25	21	248	217	91	70	58	270	282	130	108	89
Fullerton	36	142	35	26	29	164	7	45	46	49	116	31	143	160	159	316	180	223	232	237
Garden Grove	11	10	132	125	111	124	100	260	239	169	4,547	2,183	894	545	495	4,682	2,293	1,286	909	775
Huntington Beach	358	336	119	29	35	72	68	135	190	184	1,077	1,089	263	123	126	1,507	1,493	517	342	345
Irvine			172	15	22	514	576	651	39	43	1,382	1,385	1,329	154	146	1,898	1,961	2,152	208	211
La Habra	1	103	85	89	26		49	39	40	78	1,585	228	220	216	105	1,586	380	344	345	209
La Palma **			11	11	11	11	11	11	10	10	34	34	40	36	36	45	45	62	57	57
Laguna Beach	184	156	152	45	NA	11	17	6	6	NA	47	13	12	12	NA	242	186	170	63	56
Laguna Hills	247	250	5	5	7	0		10	10	13	0		195	52	45	247	250	210	67	65
Laguna Niguel	216	235	234	97	242				NA	NA				NA	NA	216	235	234	97	242
Laguna Woods	33	38	20	20	20	10	3	3	3	3	94	1	2	2	2	137	42	25	25	25
Lake Forest	244	217	38	54	41	103	184	119	189	146	229	149	117	174	151	578	550	274	417	338
Los Alamitos			0	DNR	DNR	109	106	59	DNR	DNR	974	803	268	DNR	DNR	1,083	909	327	DNR	DNR
Mission Viejo	437	438	440	316	323				0	0				0	0	437	438	440	316	323
Newport Beach	14	11	24	29	19	26	21	34	36	32	197	203	180	196	19	237	235	238	261	70
Orange			44	42	43	147	16	81	81	75	802	928	268	284	239	949	944	393	407	357
Placentia	1	1	DNR	DNR	DNR	64	64	DNR	DNR	DNR	288	268	DNR	DNR	DNR	333	333	DNR	DNR	DNR
R S Margarita	68	165	112	59	59				0	0	353	414	468	0	0	421	579	578	59	59
San Clemente	572	924	910	562	657				0	0				0	0	572	924	910	562	657
S J Capistrano	387	360	278	196	DNR	298	325	13	13	DNR	920	900	1,439	1,439	DNR	1,605	1,585	1,730	1,648	DNR
Santa Ana	19	88	179	176	130	38	21	357	364	264	603	528	1,240	1,181	902	680	637	1,776	1,721	1,296
Seal Beach	67	118	122	12	12	19	29	8	8	8	4	53	9	7	7	90	200	139	27	27
Stanton	203	206	208	37	37	82	75	86	47	45	101	191	162	144	135	386	472	456	228	217
Tustin***		12	12	14	14	68	48	50	43	44	61	242	45	51	80	129	302	107	108	138
Villa Park			2	2	2	5	5	2	1	1	5	5	7	2	2	10	10	11	5	5
Westminster	250	157	130	152	163	357	330	88	53	51		89	401	243	239	607	576	599	448	453
Yorba Linda *	35	22	14	10	9	168	88	76	65	54	13	15	23	21	21	216	125	113	96	84
County of Orange****	125	125	189	108	104	51	51	20	19	15	0	0	112	60	44	176	176	321	187	163
TOTALS	3,797	4,701	4,434	2,946	2,770	3,831	2,852	2,976	2,184	1,859	14,333	10,960	10,107	7,224	4,669	21,961	18,513	17,517	12,354	9,354

DNR = Data Not Reported - See Individual PEA

NA = Not Applicable

Note: For 2010-11, no food facilities were included in Table 9.2 of the Unified Annual Report; however, food facilities are included in the individual commercial inventory for each jurisdiction.

** Note: For 2009-10, including food facilities, the total number of facilities in the inventory for the City of Brea is 413.

*** Note: For 2009-10, including food facilities, the number of low priority facilities for the City of Fountain Valley is 276 and the total number of facilities in the inventory is 315.

**** Note: For 2009-10, including food facilities, the number of low priority facilities for the City of Tustin is 263 and the total number of facilities in the inventory is 325.

* Note: For 2009-10, the City of Yorba Linda values exclude eating and drinking establishments.

^ Note: For 2011-12, the City of La Palma includes eating and drinking establishments in as low priority facilities.

SECTION C-9.0, EXISTING DEVELOPMENT

Table C-9.3: Industrial Inventory & BMP Implementation: Comparison of 2007-08, 2008-09, 2009-10, 2010-11, and 2011-12

PERMITTEE	FULLY Implemented 2007-08	FULLY Implemented 2008-09	FULLY Implemented 2009-10	FULLY Implemented 2010-11	FULLY Implemented 2011-12	PARTIALLY Implemented 2007-08	PARTIALLY Implemented 2008-09	PARTIALLY Implemented 2009-10	PARTIALLY Implemented 2010-11	PARTIALLY Implemented 2011-12	NO BMP's Implemented 2007-08	NO BMP's Implemented 2008-09	NO BMP's Implemented 2009-10	NO BMP's Implemented 2010-11	NO BMP's Implemented 2011-12	TOTAL 2007-08	TOTAL 2008-09	TOTAL 2009-10	TOTAL 2010-11	TOTAL 2011-12
Aliso Viejo	43	42	42	42	42				0	0				0	0	43	42	42	42	42
Anaheim	228	293	474	348	609	85	31	26	43	122			0	0	0	313	324	500	391	731
Brea	12	68	48	13	17	8	2	1	1	1	1		0	0	0	21	68	49	14	18
Buena Park		116	43	88	111		24	80	17	12		3	8	6	3	0	143	131	121	126
Costa Mesa	101	14	41	14	19	4	19	35	10	12			0	0	0	105	33	76	24	31
Cypress	15	1	5	16	19	8	3	7	1	1			0	0	0	23	4	12	17	20
Dana Point	1	1	1	1	2		1	1	1	0	1		0	0	0	2	2	2	2	2
Fountain Valley	46	47	46	17	18	8	3	5	1	2	0	0	0	0	0	54	50	51	18	20
Fulerton	180	370	350	313	102	0	22	23	2	9	0		0	0	0	180	392	373	315	111
Garden Grove	194	108	60	88	91	39	36	19	34	32			0	0	0	233	144	78	120	123
Huntington Beach	9	13	37	128	91	17	15	24	41	28	23	22	40	0	2	49	50	101	187	121
Irvine	130	347	54	99	56	8	21	6	3	11			0	0	0	139	369	60	102	67
La Habra		43	49	57	63		17	14	3	1			0	0	0	0	60	63	60	64
La Palma	7	10	17	19	17	3	1	2	0	0			0	0	0	10	11	19	19	17
Laguna Beach			4	4	4			1	0	1			1	0	0	0	0	6	7	6
Laguna Hills	DNR		1	1	1	DNR			0	0	DNR			0	0	DNR	0	1	1	1
Laguna Niguel				N/A	NA				N/A	NA				N/A	NA		0	N/A	N/A	0
Laguna Woods			N/A	N/A	NA			N/A	N/A	NA			N/A	N/A	NA		0	0	N/A	0
Lake Forest	8	8	NA	6	6		2	2	4	3			0	0	0	8	10	2	10	9
Los Alamitos	5	5	11	DNR	DNR			0	DNR	DNR			0	DNR	DNR	5	6	11	DNR	DNR
Mission Viejo	4	3	3	2	3			0	1	0			0	0	0	4	3	3	3	3
Newport Beach	5	9	7	10	13	7	3	1	4	1	0	0	0	0	0	12	12	8	14	14
Orange	227	72	156	153	158	4	1	0	0	0			0	0	0	231	73	158	153	158
Placentia	2	2	DNR	DNR	DNR	6	6	DNR	DNR	DNR			DNR	DNR	DNR	8	8	DNR	DNR	DNR
R S Margarita		2		2	1				0	1				0	0	0	2	0	2	2
San Clemente					3					0				0	0	0	0	0	0	3
San Juan Capistrano	20	18	10	20	DNR				0	DNR				0	DNR	20		19	20	DNR
Santa Ana	48	93	58	469	312	66	6	54	81	69			0	0	0	114	99	112	560	391
Seal Beach	2	2	4	6	3			1	0	0			0	0	0	2	2	5	6	3
Stanton	144	25	20	26	25	4	4	6	9	4			0	0	0	148	29	26	35	29
Tustin	12	115	55	43	47	3	11	1	3	5			0	0	1	15	128	56	48	53
Villa Park			0	0	0			0	0	0			0	0	0	0	0	0	0	0
Westminster	9	14	20	22	18	4	4	0	0	3			0	0	0	13	18	20	22	21
Yorba Linda	40	48	52	55	21	1		0	0	0			0	0	0	41	48	52	55	21
County of Orange	16	13	14	13	19	2	2	4	1	1	0	0	0	0	0	18	15	18	14	20
TOTALS	1,518	1,900	1,690	2,094	1,891	278	234	313	260	319	25	25	49	6	6	1,821	2,159	2,052	2,350	2,216

DNR - Data Not Reported - See Individual PEA

N/A = Not Applicable

SECTION C-9.0, EXISTING DEVELOPMENT

Table C-9.4: Commercial Inventory & BMP Implementation: Comparison of 2007-08, 2008-09, 2009-10, 2010-11, and 2011-12

PERMITTEE	FULLY Implemented 2007-08	FULLY Implemented 2008-09	FULLY Implemented 2009-10	FULLY Implemented 2010-11	FULLY Implemented 2011-12	PARTIALLY Implemented 2007-08	PARTIALLY Implemented 2008-09	PARTIALLY Implemented 2009-10	PARTIALLY Implemented 2010-11	PARTIALLY Implemented 2011-12	NO BMPs Implemented 2007-08	NO BMPs Implemented 2008-09	NO BMPs Implemented 2009-10	NO BMPs Implemented 2010-11	NO BMPs Implemented 2011-12	TOTAL 2007-08	TOTAL 2008-09	TOTAL 2009-10	TOTAL 2010-11	TOTAL 2011-12
Aliso Viejo	119	120	131	131	131				0	0				0	0	119	120	131	131	131
Anaheim	84	198	266	591	604	18	5	35	38	90			0		0	102	201	301	629	694
Brea	172	175	207	13	85	13		20	1	1			0	0	0	185	175	227	14	86
Buena Park		141	97	3	56		255	89	82	73		6	11	3	15	0	402	197	88	144
Costa Mesa	945	52	51	198	170		38	27	30	19			0	0	0	945	90	78	228	189
Cypress	98	305	51	40	71	47	28	43	67	40			0	0	0	145	333	94	107	111
Dana Point		68	126	12	11	115	95	32	1	4			0	0	0	115	181	158	13	15
Fountain Valley	207	207	209	30	19	63	63	106	7	8	0	0	0	0	0	270	270	315	37	27
Fullerton	316	175	213	66	231	0	5	10	0	6	0		0	0	0	316	180	223	66	237
Garden Grove	880	749	1,000	531	277	482	186	304	245	108	1		1	0	0	1,363	935	1,305	776	383
Huntington Beach	7	21	89	139	100	20	41	60	28	15	17	21	70	0	8	44	83	219	167	123
Irvine			86	52	64			44	3	4			0	0	0	0	0	130	55	68
La Habra			98	102	100			12	15	0			0	0	0	0	0	110	117	100
La Palma	43	37	61	33	38	2	8	1	24	20			0	0	0	45	45	62	57	58
Laguna Beach	189	11	15	5	4	9	10	35	4	1			0	0	0	198	21	50	9	5
Laguna Hills**	229	192	6	15	17	0		0	0	1	18	58	0	0	1	247	250	6	15	19
Laguna Niguel	103	187	113	9	108	49	48	23	8	73			0	0	0	152	235	136	17	181
Laguna Woods		32	25	25	25	12	1	0	0	0			0	0	0	12	33	26	25	25
Lake Forest	310	13	10	152	65	75	33	25	85	35		1	0	0	0	385	47	35	237	100
Los Alamitos	1,083	909	31	DNR	DNR			13	DNR	DNR			0	DNR	DNR	1,083	909	44	DNR	DNR
Mission Viejo	380	349	347	307	323	77	89	93	9	0			0	0	0	437	439	440	316	323
Newport Beach	13	8	20	25	70	1	3	4	4	0	0	0	0	0	0	14	11	24	29	70
Orange	16	38	141	70	138	1	1	1	0	0			0	0	0	17	39	142	70	138
Placentia			DNR	DNR	DNR			DNR	DNR	DNR			DNR	DNR	DNR	0	0	DNR	DNR	DNR
R S Margarita		112	143	165	14			0	0	45			0	0	0	0	112	143	165	59
San Clemente					133					0					0	0	0	0	0	133
San Juan Capistrano	142	193	189	186	DNR	15	23	14	10	DNR			0	DNR		157	216	203	196	DNR
Santa Ana				536	395				116	88			0	0	0	0	0	0	652	483
Seal Beach			124	19	14			7	2	1			0	0	0	0	0	131	21	15
Stanton	143	115	65	65	71	8	7	13	26	8			0	0	0	151	122	78	91	79
Tustin*		72	12	103	18		3	5	11	0			0	0	0	0	75	17	114	18
Villa Park		7	8	5	DNR	10	3	3	0	DNR			0	0	DNR	10	10	11	5	DNR
Westminster	454	489	305	349	385	153	87	23	96	68			0	0	0	607	576	328	445	453
Yorba Linda	14	104	95	26	31	6	21	53	2	0			0	0	0	20	125	148	28	31
County of Orange	102	112	80	109	99	18	19	34	46	45	0	0	0	0	0	121	131	114	156	144
TOTALS	6,029	5,187	4,414	4,110	3,887	1,195	1,072	1,129	880	751	36	88	82	3	24	7,280	8,345	5,625	5,073	4,642

DNR = Data Not Reported - See Individual PEA

N/A = Not Applicable

* Note: The City of Tustin did not inspect commercial facility inspections during 2002-03, 2003-04, 2005-06 and 2006-07. All commercial facilities were inspected for prioritization only in 2004-05
 ** Note: The City of Laguna Hills data for the 2008-07 reporting period has been corrected.

SECTION C-9.0, EXISTING DEVELOPMENT

Table C-9.5: Food Facility Inspections, 2011-12

PERMITTEE	No. of Routine Inspections	Number of Food Facilities (approx)	No. of Inspections with NPDES Issues (Incl. multiple issues per visit)	% of routine inspections with NPDES issues
Aliso Viejo	115	55	14	12.2%
Anaheim	1,730	1,730	79	4.6%
Brea	195	188	7	3.6%
Buena Park	DNR	DNR	DNR	DNR
Costa Mesa	612	423	182	29.7%
Cypress	96	154	21	21.9%
Dana Point	155	111	44	28.4%
Fountain Valley	274	274	66	24.1%
Fullerton	847	356	536	63.3%
Garden Grove	855	577	311	36.4%
Huntington Beach	468	558	69	14.7%
Irvine	640	809	166	25.9%
La Habra	196	205	23	11.7%
La Palma	37	37	20	54.1%
Laguna Beach	80	145	6	7.5%
Laguna Hills	165	146	26	15.8%
Laguna Niguel	221	141	80	36.2%
Laguna Woods	12	23	1	8.3%
Lake Forest	131	131	37	28.2%
Los Alamitos	DNR	DNR	DNR	DNR
Mission Viejo	165	147	72	43.6%
Newport Beach	661	399	131	19.8%
Orange	403	562	101	25.1%
Placentia	DNR	DNR	DNR	DNR
Rancho Santa Margarita	104	106	33	31.7%
San Clemente	353	261	79	22.4%
San Juan Capistrano	DNR	DNR	DNR	DNR
Santa Ana	974	860	295	30.3%
Seal Beach	96	120	6	6.3%
Slanton	137	184	27	19.7%
Tustin	328	368	95	29.0%
Villa Park	7	10	0	0.0%
Westminster	116	303	10	8.6%
Yorba Linda	131	154	80	61.1%
County of Orange	95	129	48	50.5%
Totals	10,399	9,666	2,665	

DNR = Data Not Reported - See Individual PEA

SECTION C-9.0, EXISTING DEVELOPMENT

Table C-9.6: Permittee Enforcement Actions for Industrial Facilities: Comparison of 2007-08, 2008-09, 2009-10, 2010-11, and 2011-12

PERMITTEE	EL 2007-08	EL 2008-09	EL 2009-10	EL 2010-11	EL 2011-12	NON 2007-08	NON 2008-09	NON 2009-10	NON 2010-11	NON 2011-12	ACO 2007-08	ACO 2008-09	ACO 2009-10	ACO 2010-11	ACO 2011-12	CDO 2007-08	CDO 2008-09	CDO 2009-10	CDO 2010-11	CDO 2011-12	MI 2007-08	MI 2008-09	MI 2009-10	MI 2010-11	MI 2011-12	Total 2007-08	Total 2008-09	Total 2009-10	Total 2010-11	Total 2011-12		
Aliso Viejo			0	0	4			0	0	0			0	0	0			0	0	0			0	0	0	0	0	0	0	0	4	
Anaheim	8	3	67	120	119		2		1	3	3	2	0	1	3			0	0	0			0	0	0	0	8	7	68	124	125	
Brea			0	1	0			0	0	1			0	0	0			0	0	0			0	0	0	0	0	0	0	1	1	
Buena Park		0	53	17	111		5	4	11	3		1	0	3	3		0	0	0	0		0	0	0	0	0	0	6	57	31	117	
Costa Mesa					4		2	1		0		4			0					0					1	4	2	1	0	0	5	
Cypress	23		0	0	0	8	3	7	2	0			0	0	0			0	0	0			0	0	0	31	3	7	2	0	0	
Dana Point		1	0	0	0			0	0	0			0	0	0			0	0	0			0	0	0	0	1	0	0	0	0	
Fountain Valley	16	3	1	0	2	4	3	0	0	0	2	1	0	0	0	2	0	0	0	0		0		0	0	24	7	1	0	0	2	
Fullerton				0	0	6	4		14	8	5			0	0	11	3		1	1		2		0	1	22	9	0	15	10		
Garden Grove	18		0	1	0	62	5	2	2	0	5		0	1	0			0	0	0			0	0	DNR	85	5	2	4	0	0	
Huntington Beach			0	0	4	5	10	3	31	24	3	3	3	2	0			0	0	0			0	0	0	8	13	6	33	28		
Irvine			0	0	0	2		0	0	0			0	0	0			0	0	0			0	0	0	2	0	0	0	0	0	
La Habra			0	3	28			1	0	1			0	0	0			0	0	0			0	0	0	0	0	0	1	3	28	
La Palma			7	41	28		1	0	0	0			0	0	0			0	0	0			0	0	0	0	1	7	41	28		
Laguna Beach			0	0	0			0	0	0			1	0	0			0	0	0			0	0	0	0	0	1	0	0	0	
Laguna Hills					0				0	0				0	0				0	0				0	0	N/A	0	0	0	0	0	
Laguna Niguel				N/A	NA				N/A	NA				N/A	NA				N/A	NA				N/A	NA		0	N/A	N/A	N/A	0	0
Laguna Woods			N/A	N/A	NA			N/A	N/A	NA			N/A	N/A	NA			N/A	N/A	NA			N/A	N/A	NA		0	N/A	N/A	N/A	0	0
Lake Forest			0	0	2			0	2	1			0	2	0			0	0	0			0	0	0	0	0	0	0	4	3	
Los Alamitos	1		0	DNR	DNR			0	DNR	DNR			0	DNR	DNR			0	DNR	DNR			0	DNR	DNR	1	0	0	0	DNR	0	0
Mission Viejo			0	0	0			0	1	0			0	0	0			0	0	0			0	0	0	0	0	0	0	1	0	0
Newport Beach	0	0	1	0	13	3	3	2	4	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3	3	4	14		
Orange			0	0	0	2	3	0	0	0			0	0	0			0	0	0			0	0	0	2	3	0	0	0	0	0
Pacifica	3	3	DNR	DNR	DNR		4	DNR	DNR	DNR		3	DNR	DNR	DNR		4	DNR	DNR	DNR			DNR	DNR	DNR	3	14	DNR	DNR	0	0	0
R S Margarita		2	2	0	1				0	0				0	0				0	0				0	0	0	0	2	2	0	1	
San Clemente				0	0				0	0				0	0				0	0				0	0	0	0	0	0	0	0	0
San Juan Capistrano			0	0	DNR			0	0	DNR			0	0	DNR			0	0	DNR			0	0	DNR	0	0	0	0	0	0	0
Santa Ana			0	0	0			0	10	8			0	0	0			0	0	0			0	0	0	0	0	0	0	10	8	
Seal Beach			0	0	0			0	0	0			0	0	0			0	0	0			0	0	0	0	0	0	0	0	0	0
Stanton				0	0	5	3	1	1	1			2	0	0				0	0				0	0	5	3	1	3	1		
Tustin			0	0	0			0	0	0			0	0	0			0	0	0			0	0	0	0	0	0	0	0	0	0
Villa Park				0	0				0	0			0	0	0				0	0				0	0	0	0	0	0	0	0	0
Westminster			0	0	0	2	2	2	1	2			0	0	0			0	0	0			0	0	0	2	0	2	1	2		
Yorba Linda			0	0	0			0	0	0			0	0	0			0	0	0			0	0	0	0	0	0	0	0	0	0
County of Orange	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0
TOTALS	69	12	131	183	316	100	50	24	82	53	19	10	4	11	6	13	7	0	1	1	0	2	0	0	2	201	81	159	277	378		

DNR = Data Not Reported - See Individual PEA

EL = Educational Letter

ACO = Administrative Compliance Order

MI = Misdemeanor/Infraction

N/A = Not Applicable

NON = Notice of Non-compliance

CDO = Cease and Desist Order

* Enforcement actions against industrial facilities are included with commercial facilities.

SECTION C-9.0, EXISTING DEVELOPMENT

Table C-9.7: Permittee Enforcement Actions for Commercial Facilities: Comparison of 2007-08, 2008-09, 2009-10, 2010-11, and 2011-12

PERMITTEE	EL 2007-08	EL 2008-09	EL 2009-10	EL 2010-11	EL 2011-12	NON 2007-08	NON 2008-09	NON 2009-10	NON 2010-11	NON 2011-12	ACO 2007-08	ACO 2008-09	ACO 2009-10	ACO 2010-11	ACO 2011-12	CDO 2007-08	CDO 2008-09	CDO 2009-10	CDO 2010-11	CDO 2011-12	M/I 2007-08	M/I 2008-09	M/I 2009-10	M/I 2010-11	M/I 2011-12	Total 2007-08	Total 2008-09	Total 2009-10	Total 2010-11	Total 2011-12	
Aliso Viejo			3	3	4			0	0	0			22	7	0			0	1	0			0	0	0	0	0	25	11	4	
Anaheim	18	3	53	123	88		9	4	4	2		9	3	1	1			0		0			0	0	0	18	21	60	128	91	
Brea			0	1	0	1	1	0	0	1			0	0	0			0	0	0			0	0	0	1	1	0	1	1	
Buena Park		0	106	11	110		61	36	2	15		12	4	1	2		0	1	0	0		0	1	0	0	0	73	148	14	127	
Costa Mesa			1	0	4		3	2	1	0			0	0	0			0	0	1		0	1	0	0	0	3	3	1	6	
Cypress			0	0	0	8	45	43	67	40			0	0	0			0	0	0			0	1	0	0	8	45	43	67	40
Dana Point		95		1	50	44		32	42	8			0	0	0			0	0	0			0	0	0	8	45	3	1	6	
Fountain Valley	457	16	31	9	12	0	0	3	1	1	3	3	1	1	8	3	3	0	1	1	0	0	0	0	2	44	95	32	43	60	
Fullerton				0	0	17	9		3	6			0	0	0		9		0	0		0	0	0	0	463	22	35	12	22	
Garden Grove	18	3	4	1	8	82	34	22	15	7	5	1	3	0	1			1	1	1		6		0	0	17	26	0	3	6	
Huntington Beach*			0	0	19	25	39	67	74	69	14	11	20	28	16			1	0	0			0	0	0	85	38	30	17	17	
Irvine			0	0	DNR			0	0	DNR			0	0	0			0	0	0			0	0	0	39	50	88	102	104	
La Habra			1	15	53			0	0	0			0	0	0			0	0	0			0	0	0	0	0	0	0	0	0
La Palma	2		6	36	4	2		0	0	0			1	0	0			0	0	0			0	0	0	0	0	1	15	53	
Laguna Beach	3	7	8	0	0		9		0	0	103	116	7	2	0			0	0	0			0	0	0	4	0	7	36	4	
Laguna Hills		9	6	39	3		7	3	1	2		1	0	0	0			0	2	0			0	0	0	106	132	15	4	0	
Laguna Niguel				62	127	2		0	0	0			0	0	0			0	0	0			0	0	0	0	17	9	40	5	
Laguna Woods			1	0	0			1	3	1			0	5	0			0	0	0			0	0	0	2	0	0	62	127	
Lake Forest			0	0	35	13	10	7	33	0	3	4	1	3	0	4	4	0	11	0			0	0	0	0	0	2	8	1	
Los Alamitos	5		0	DNR	DNR	5		0	DNR	DNR			0	DNR	DNR			0	DNR	DNR	5		0	0	0	20	18	8	47	35	
Mission Viejo				2	3	13	13	2	1	2	19	19	0	6	5	1		0	DNR	DNR			0	DNR	DNR	15	0	0	DNR	0	
Newport Beach	0	0	6	0	DNR	1	3	5	4	DNR	0	0	0	0	0	0	0	0	0	0	1	1	0	0	1	34	32	2	9	12	
Orange			0	0	0		7	1	0	1			0	0	0			0	0	0		0		0	0	1	3	11	4	0	
Placentia	3	10	DNR	DNR	DNR			DNR	DNR	DNR			DNR	DNR	DNR			0	0	0			0	0	0	0	7	1	0	1	
R S Margarita	68	112	0		45			0		0			0	0	0			DNR	DNR	DNR			DNR	DNR	DNR	3	10	DNR	DNR	0	
San Clemente				0	0				0	3			0	0	0			0	22	0			0	0	0	68	112	0	22	45	
San Juan Capistrano	5	5	3	6	DNR	12	18	11	20	DNR	3		0	0	0			0	0	0			0	0	0	0	0	0	0	0	3
Santa Ana			0	0	0			0	20	21			0	0	0			0		DNR			0		DNR	20	23	14	26	0	
Seal Beach		1	0	0	0		6	2	0	0		2	0	0	0			0	0	0			0	0	0	0	0	0	20	21	
Stanton					0	7	7	6	0	3			4	3					1	0			0	0	0	0	9	2	0	0	0
Tustin**			0	0	0			0	0	0			0	0	0			0	0	0			0	0	0	7	7	6	5	6	
Villa Park		10	3	2	DNR			0	0	DNR			0	2	0			0	0	0			0	0	0	0	0	0	0	0	0
Westminster			0	0	0	16	22	21	51	35			0	0	0			0	0	0			0	0	0	0	10	3	4	0	0
Yorba Linda		1	0	1	0			0	0	0			0	0	0			0	0	0			0	45	33	16	22	21	96	68	
County of Orange	8	1	3	16	3	8	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0
TOTALS	587	273	235	328	568	236	303	268	342	218	150	181	62	60	36	8	16	3	39	4	6	6	1	45	37	987	779	569	814	863	

DNR = Data Not Reported - See Individual PEA

EL = Educational Letter

ACO = Administrative Order

DNR = Data Not Reported - See Individual PEA
N/A = Not Applicable

EL = Educational Letter
NON = Notice of Non-compliance

ACO = Administrative Compliance Order
CDO = Cease and Desist Order

** Note: The City of Tustin did not inspect commercial facility inspections during 2002-03, 2003-04, 2005-06 and 2006-07. All commercial facilities were inspected for prioritization only in 2004-05.

SECTION C-9.0, EXISTING DEVELOPMENT

Table C-9.8 Current and Potential Outcome Levels (Industrial/Commercial)

Industrial/Commercial Program Component	Effectiveness Assessment Outcome Levels					
	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6
	Document Stormwater Program Activities	Raise Awareness	Change Behavior	Load Reduction	Runoff Quality	Receiving Water Quality
Inventory	✓ Maintain inventory					
Prioritization	✓ Assign priorities		✓ Change in prioritization level			
Inspection	✓ Conduct and Track number of inspections		✓ # BMPs implement	^P Load reduction associated with BMPs		
Enforcement/ Reporting	✓ Conduct enforcement		✓ Extent and correction of problem level of enforcement			
Training	✓ Track number/type of training sessions	^P Surveys show improved knowledge				
Key: ✓ = Currently Achieved Outcome Level ^P = Potentially Achievable Outcome Level						

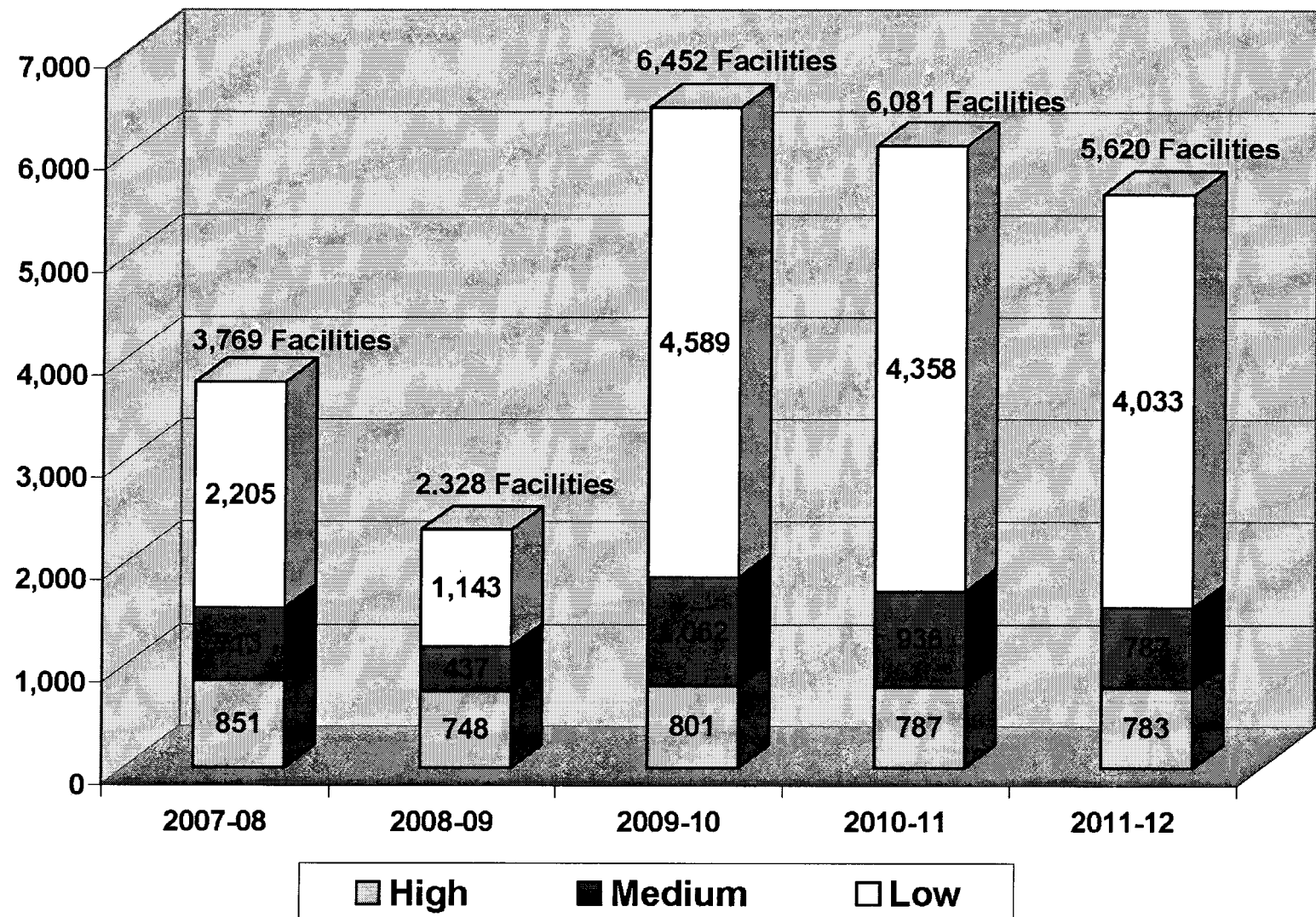
SECTION C-9.0, EXISTING DEVELOPMENT

Table C-9.9 Current and Potential Outcome Levels (Residential)

Residential & CIA/HOA Program Component	Effectiveness Assessment Outcome Levels					
	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6
	Implement Program	Increase Awareness	Behavior Change	Load Reduction	Runoff Quality	Receiving Water Quality
Identification/Inventory	✓ Maintain inventory					
BMP Implementation	✓ Conduct Inspections	✓ BMP Implementatio n	✓ Track number of BMPs implemented	^P Load reduction associated with BMPs		
Enforcement/ Reporting	✓ Issue EAs	✓ Track number of EAs issued & response	^P Correction of problem			
Key: ✓ = Currently Achieved Outcome Level ^P = Potentially Achievable Outcome Level						

SECTION C-9.0, EXISTING DEVELOPMENT

Figure C-9.1: Industrial Facility Prioritization, 2007-08 to 2011-12



SECTION C-9.0, EXISTING DEVELOPMENT

Figure C-9.2: Commercial Facility Prioritization, 2007-08 to 2011-12

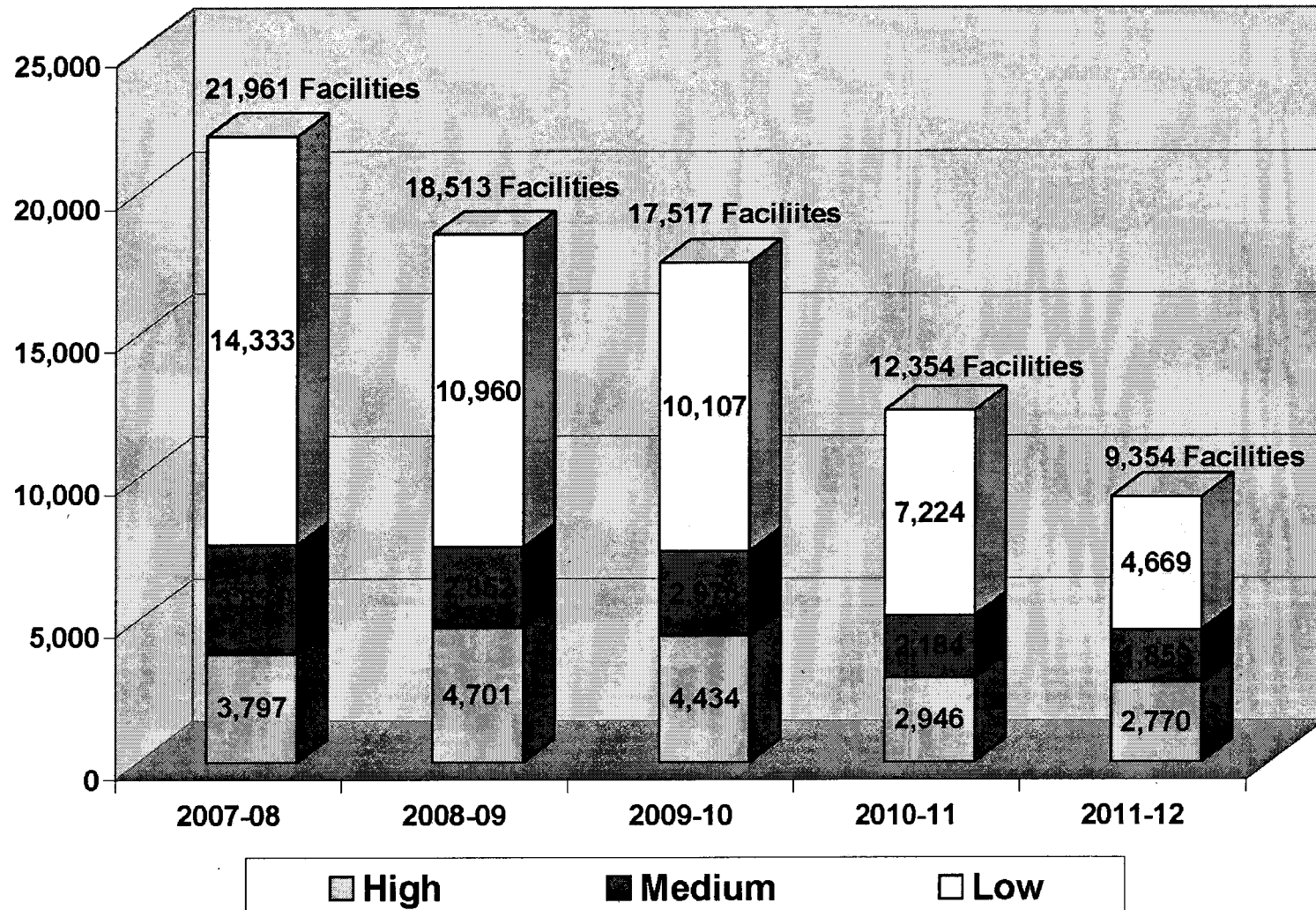


Figure C-9.3: Industrial/Commercial Facility Prioritization, 2007-08 to 2011-12

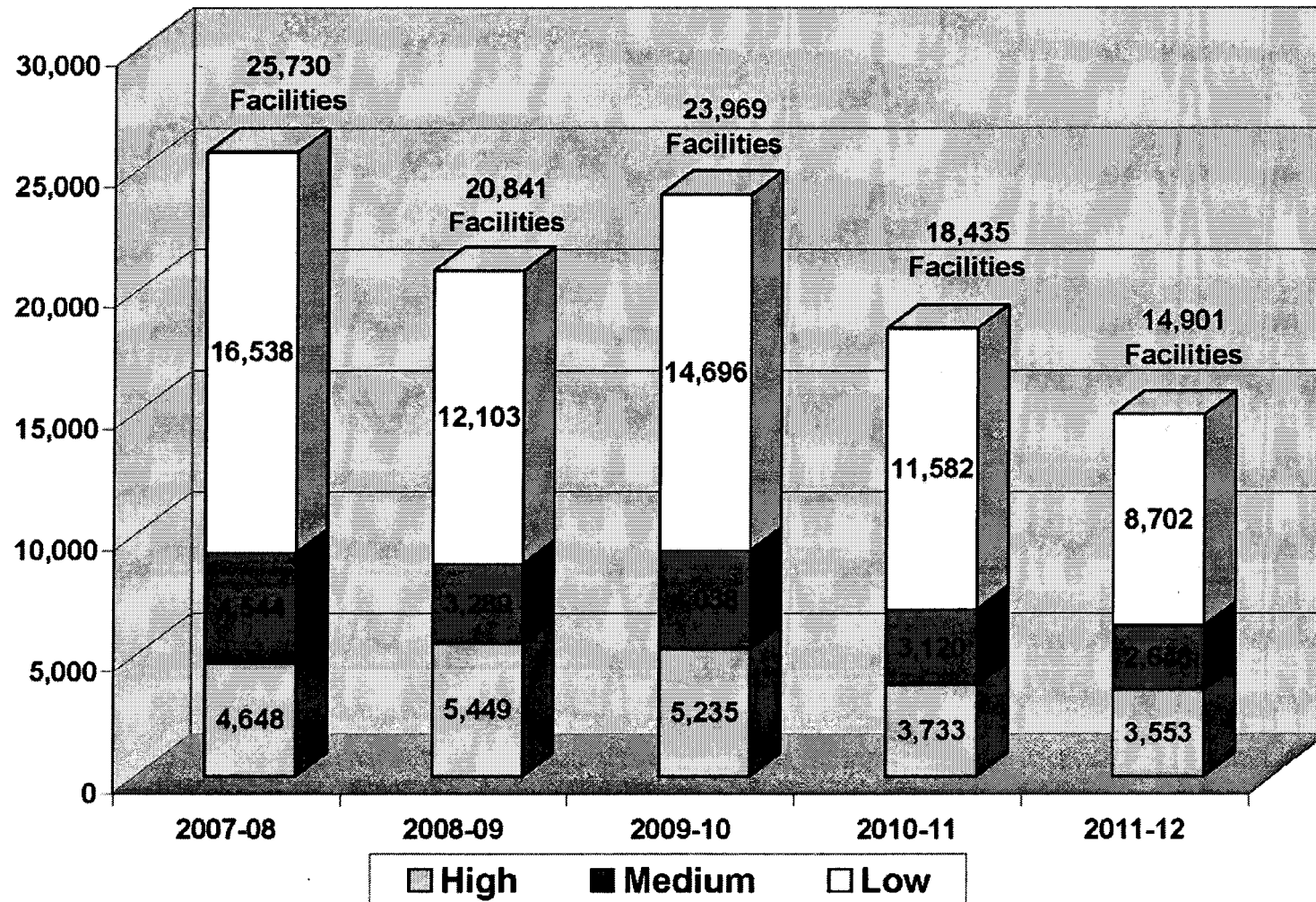
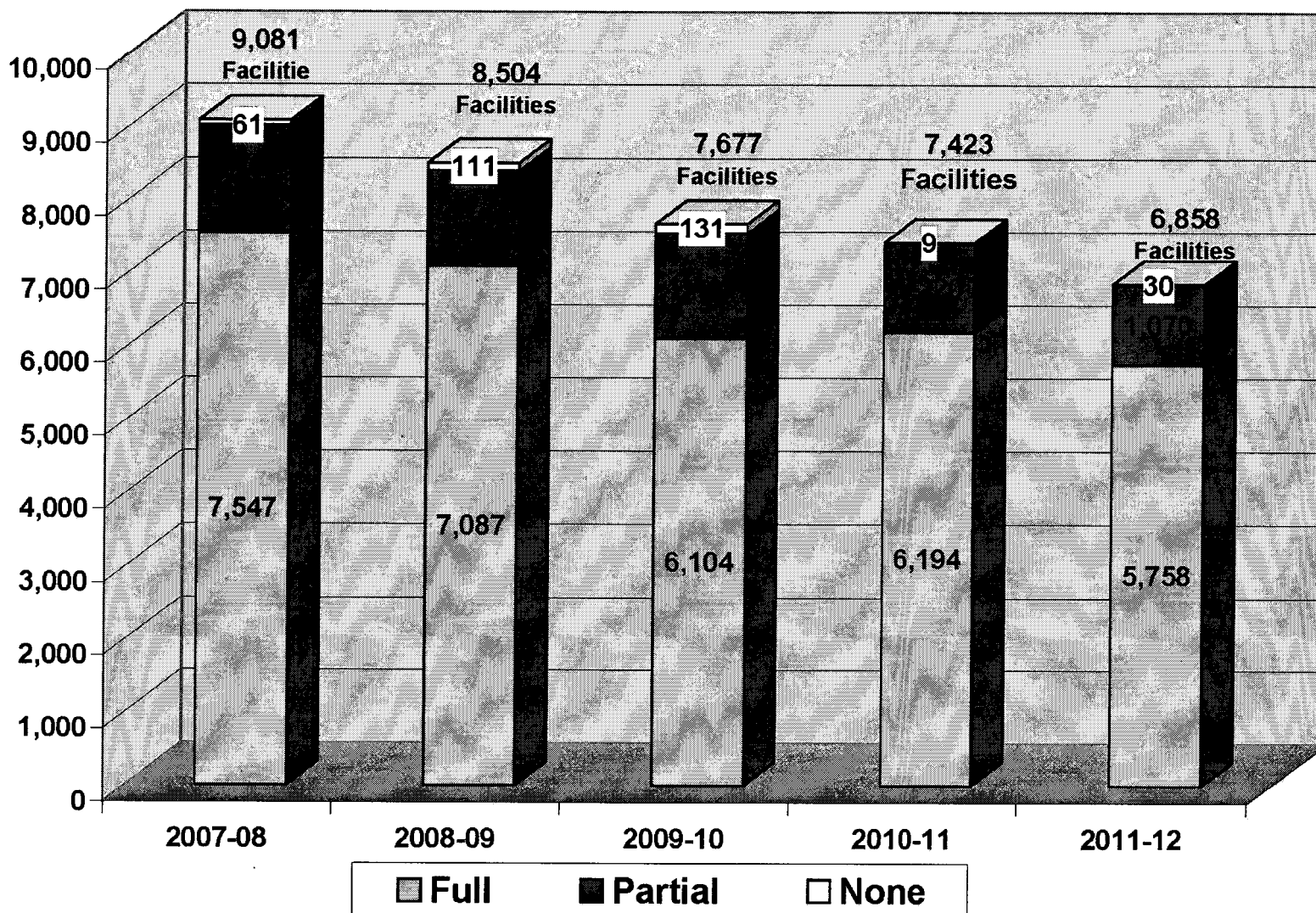
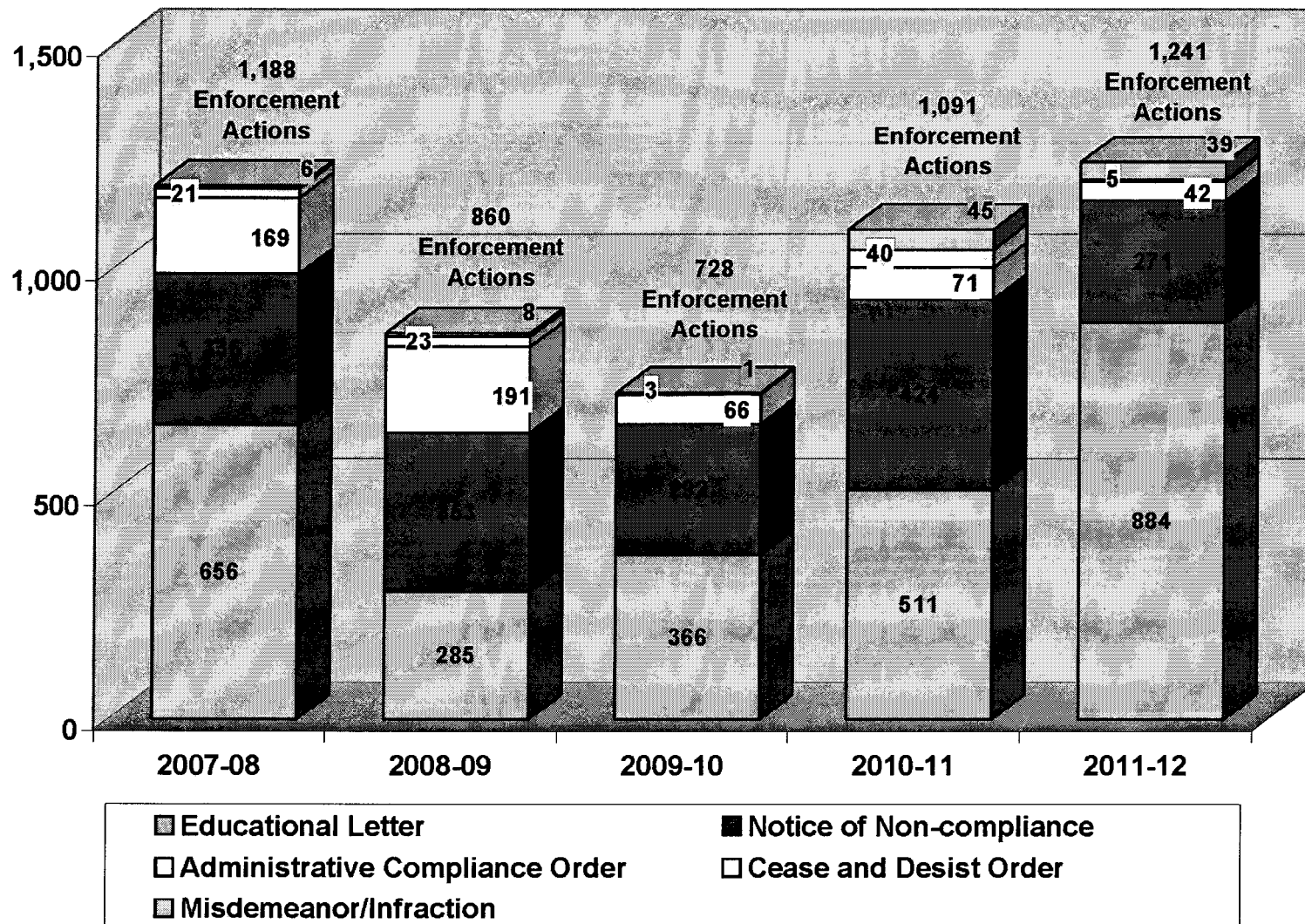


Figure C-9.4: Industrial/Commercial Facility BMP Implementation, 2007-08 to 2011-12



SECTION C-9.0, EXISTING DEVELOPMENT

Figure C-9.5: Industrial/Commercial Enforcement Actions, 2007-08 to 2011-12



SECTION C-9.0, EXISTING DEVELOPMENT

Figure C-9.6: Industrial Facility BMP Implementation, 2007-08 to 2011-12

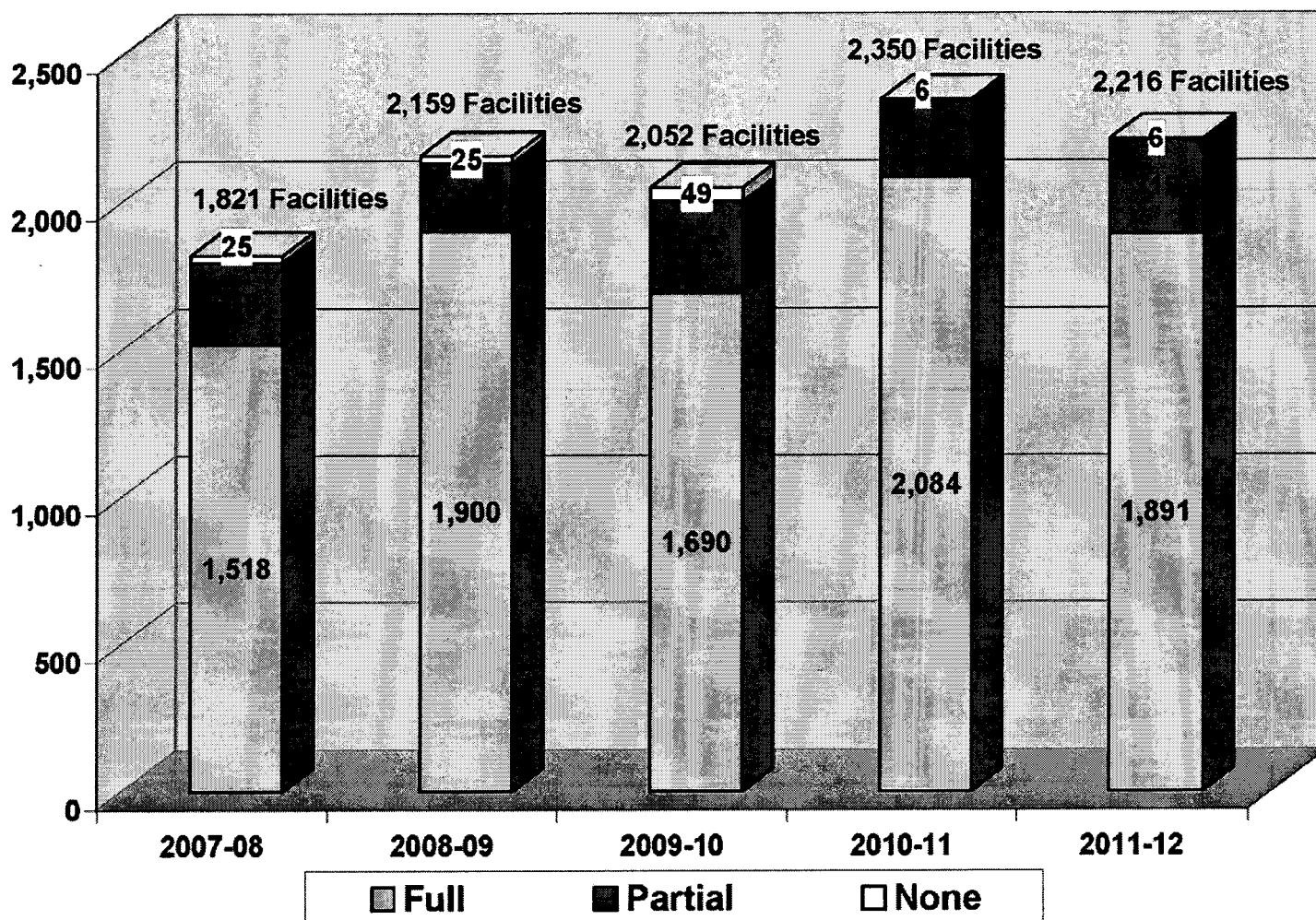
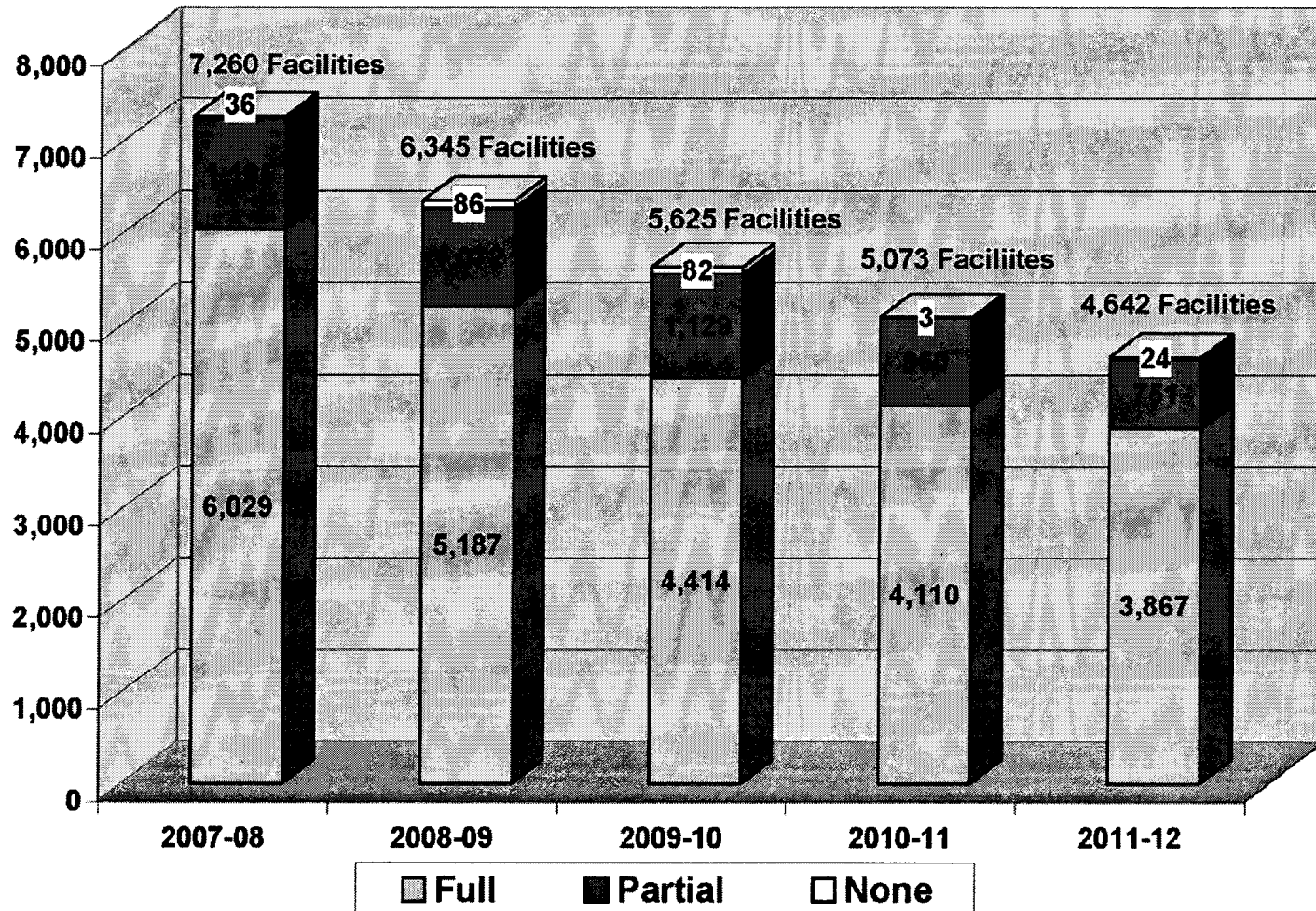
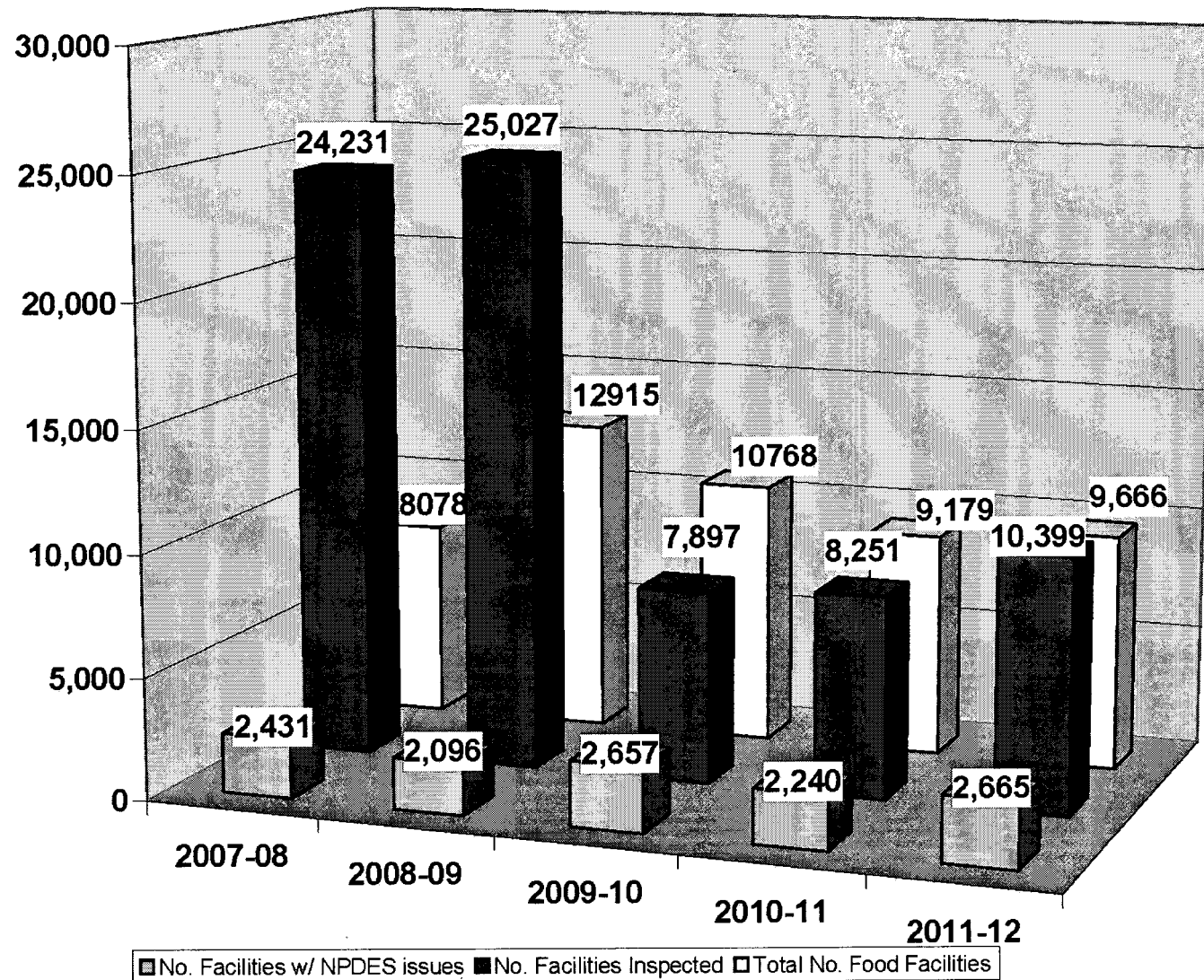


Figure C-9.7: Commercial Facility BMP Implementation, 2007-08 to 2011-12



SECTION C-9.0, EXISTING DEVELOPMENT

Figure C-9.8: Food Facility Inspections, 2007-08 to 2011-12



SECTION C-9

EXISTING DEVELOPMENT

**PROGRAM EFFECTIVENESS ASSESSMENT
2011-12**





SECTION C-9, Existing Development

C-9.0 EXISTING DEVELOPMENT

C-9.1 Introduction

The existing development component of this report is composed of the following elements:

Section C-9.2, Industrial Program

Section C-9.3, Commercial Program

Section C-9.4, Residential Program

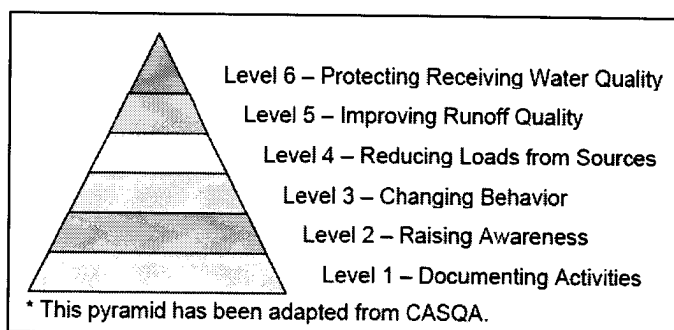
Section C-9.5, Common Interest Area/Homeowner Association (CIA/HOA) Program

Section C-9.6, Mobile Business Program

Section C-9.7, Post-Construction BMP Inspection and Verification for Existing Development

Section C-9.8, Existing Development Program Modifications

As described in detail in **Section C-2.5** of this PEA, the County utilizes the CASQA method of effectiveness assessment in order to demonstrate if program elements, activities, BMPs, etc., are resulting in desired outcomes. CASQA identifies six Outcome Levels (see pyramid below) and for each measure the County reports, the associated Outcome Level (more than one level may apply) is indicated by a colored triangle with a number.



The County has incorporated GIS mapping into the existing development component. Watershed maps of inventoried industrial/commercial facilities in the County's jurisdiction are included in **Attachment C-9.1**.

C-9.2 Industrial Program (LIP Section A-9.1)

C-9.2.1 Organization Chart

Figure A-9.1 of the LIP provides an organizational chart that identifies which County Departments are responsible for overseeing, implementing, and enforcing the Industrial Program.



SECTION C-9, Existing Development

C-9.2.2 Inventory

The County has developed a watershed based inventory of industrial facilities within its jurisdiction. Summaries of the industrial inventory are provided below by Regional Board region.

2011-12 Summary of Industrial Facilities by Watershed San Diego Region

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams	Totals
Industrial Facilities With General Industrial Permits	7	1	2	10
Industrial Facilities Without General Industrial Permits	3	0	0	3
Totals	10	1	2	13

Santa Ana Region

Watershed	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay	Totals
Industrial Facilities With General Industrial Permits	1	0	2	2	5
Industrial Facilities Without General Industrial Permits	2	2	1	0	5
Totals	3	2	3	2	10

The County's industrial facility inventory is updated on an ongoing basis and provided to the Regional Boards on an annual basis. The County's inventory is managed through an online web-based database with Geographical Information System (GIS) capabilities called MS4Web. The database includes pertinent information about each facility to meet Fourth Term Permit



SECTION C-9, Existing Development

requirements. In lieu of submitting data tables showing facility information, the County database information is available through the following web links:

Website (Inventory): <http://www.ms4web.com/base/wbin/IndustrialFacilities.aspx?ns=25>

User Name: PEA

Password: ocMS4!

For the 2011-12, please note two changes to the San Diego Region industrial inventory from the previous reporting year. The Greenstone Materials industrial site has been added to the San Diego Region inventory in the San Juan Creek watershed as a new facility (notification provided to the Regional Board during the 2011-12 reporting year), and the former Northrop Grumman Capistrano Test Site in the San Mateo Watershed has been removed due to the cessation of industrial site operations. A final NPDES inspection of the Northrop Grumman Test Site was conducted during the 2010-11 PEA reporting year.

C-9.2.3 Prioritization

The County prioritizes industrial facilities in its inventory as high, medium, or low in the Santa Ana Region based on their respective threat to water quality, type of industrial activities, and other related factors. The industrial prioritization is evaluated on an ongoing basis, and industrial inventories are segregated by Regional Board jurisdiction due to the different NPDES permit requirements for each region. The Fourth Term Permit for the San Diego Region does not require prioritization of facilities as high, medium, or low; however the County has retained its historical designations of these sites as part of its inventory. Summaries of the prioritizations for the Santa Ana Region and San Diego Region are provided below.

2011-12 Summary of Industrial Facility Prioritization

Industrial Facility Prioritizations	San Diego Region	Santa Ana Region	Total Number of Facilities
Facilities subject to the Industrial General Permit or equivalent permit (high priority)	10	5	15
Section 313 Title III Sara	0	0	0
Facilities with a high potential for or history of non-stormwater discharges	0	0	0
Facilities tributary to and within 500 feet of an ASBS	0	0	0
Tributary to 303(d) water body where site generates the pollutant	0	0	0
Facilities within, directly adjacent to or discharging directly to an ESA	0	0	0
Number of "other" high priority facilities	0	0	0



SECTION C-9, Existing Development

Industrial Facility Prioritizations	San Diego Region	Santa Ana Region	Total Number of Facilities
Subtotal: number of high priority facilities listed above	10	5	15
Number of medium priority facilities	0	0	0
Number of low priority facilities	3	5	8
Total Number of Facilities	13	10	23

The following tables show how the facilities listed above are segregated by watershed in each Regional Board jurisdiction. For the Santa Ana Region, the County has a total of 10 industrial sites. In lieu of the minimum 10% high and 20% medium priority designations included in the Fourth Term Permit, the County has elected to designate 50% of its inventory as high priority.

2011-12 Summary of Industrial Facility Prioritization by Watershed San Diego Region

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams	Totals
Number of high priority facilities	7	1	2	10
Number of low priority facilities	3	0	0	3
Totals	10	1	2	13

Santa Ana Region

Watershed	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay	Totals
Number of high priority facilities	1	0	2	2	5
Number of low priority facilities	2	2	1	0	5
Totals	3	2	3	2	10



SECTION C-9, Existing Development

C-9.2.4 Monitoring

When available, the County reviews facility monitoring data at industrial sites in its inventory. This task is completed as part of the inspection process, when County inspectors ask to review available stormwater monitoring data from the industrial facility operators that monitor their runoff. If no recent data is available, industrial facilities are reminded verbally that they must conduct all required monitoring specified in their Industrial General Permit requirements.

C-9.2.5 BMP Fact Sheets

BMP fact sheets have been developed and included as part of the Existing Development Program. The fact sheets include a description of specific BMPs for common industrial activities that may discharge pollutants and provide corresponding pollution prevention measures that facilities can implement to help meet the requirements of the Fourth Term Permits, the County and OCFCD Water Quality Ordinances, and the Industrial General Permit. The activity-based industrial/commercial fact sheets are numbered IC1 – IC24 and are included as **Exhibit A-9.II** of the County's LIP.

C-9.2.6 Inspections

The County inspects industrial facilities within its jurisdiction at the frequency determined by the priority ranking assigned to each facility as identified in **Section A-9.2** of its LIP. The inspections generally include a review of the material and waste handling practices, BMP implementation, and evidence of past or present unauthorized non-stormwater discharges. If there is evidence of a violation of the County and/or OCFCD Water Quality Ordinances, the County re-inspects the industrial facility in accordance with the corresponding permit requirements and provides appropriate Regional Board notifications.

The following table presents the inspection frequency by Regional Board jurisdiction:

Industrial Facility Inspection Frequency

Priority	Santa Ana Region	San Diego Region*
High	Annually	Annually
Medium	Biennially (Once every 2 years)	As-needed
Low	Once Per Permit Cycle (5 years)	As-needed

*The Fourth Term Permit for the San Diego Region does not require prioritization of industrial sites; however, the County has inspected each industrial facility in its jurisdiction during the 2011-12 reporting year. The Fourth Term Permit does require that the County inspect 20% of its combined industrial and commercial inventory; therefore, the County adds the number of industrial inspections completed to its commercial inspection amounts and reports on this combined total in **Section C-9.3.5**.



SECTION C-9, Existing Development

A summary of the number of industrial facility inspections during the 2011-12 reporting period is presented in the table below.

Jurisdictional Industrial Facility Inspection Summary



Total Number of Industrial Facilities	Number of Facilities Inspected During the Reporting Period			
	High	Med	Low	Totals
13 (San Diego Region)	10	None in inventory	3	13
10 (Santa Ana Region)*	4		2	6
Totals	14	0	5	19

*One industrial site, Merlex Stucco, was inspected by the Regional Board through the Industrial General Permit in the Santa Ana Region. In cases where a State inspection has been completed for an industrial facility during the annual reporting year, the County may not conduct an inspection.

For the Santa Ana Region, the County completed industrial NPDES inspections at four of its five high priority facilities and two of its five low priority facilities. The high priority sites include one private company, R.J. Noble, located in unincorporated Orange-Olive. The other three sites inspected include John Wayne Airport, Olinda Alpha Landfill, and Frank R. Bowerman Landfill, which are all public facilities managed by County Departments and report to the Santa Ana Regional Board through the Industrial General Permit. The County also inspected two of its five inventoried low priority sites, Nieto & Sons Trucking and West Newport Oil Company, during the 2011-12 reporting period. None of the six County-lead inspections in the Santa Ana Region warranted an enforcement action under the County and/or OCFCD Water Quality Ordinances. Additional information on BMP implementation issues for the Santa Ana Region is provided in **Section C-9.2.7** below. The West Newport Oil Company facility, which is located along the Santa Ana River and Newport Bay watershed boundaries, was determined to be in the Santa Ana River watershed and re-inventoried accordingly.

The other private company site, Merlex Stucco, was inspected by the Santa Ana Regional Board on December 12, 2011 with "No Further Action" indicated in SMARTS. For this site, Fourth Term Permit Section IX, Item 10 of R8-2009-0030 dictates that the County does not need to inspect a facility already inspected by the Regional Board within the specified time period (2011-12 reporting period).

In the San Diego Region, the County conducted industrial inspections for all thirteen facilities in its inventory (including the new Greenstone Materials facility discussed in **Section C-9.2.2**). None of the thirteen County-lead inspections in the San Diego Region resulted in an enforcement action under the County and/or OCFCD Water Quality Ordinance. For each inspection, BMP implementation procedures were evaluated and addressed with the on-site operators as part of the annual inspection process and to ensure proper BMP implementation. Additional information on BMP implementation issues for the San Diego Region is provided in **Section C-9.2.7** below.



SECTION C-9, Existing Development

The County did report one issue noted during the facility inspection to the Regional Board for follow up related to CR&R. While the County did not have formal corrective actions for CR&R as part of its industrial inspection, the County did notify the San Diego Regional Board that the facility had expanded its operation to include a composting facility to the northeast of their 2006 Expansion Area/Recycling Facility. Based on the County's inspection, it was unclear if the SWPPP for the CR&R facility had addressed this expansion for composting, and the San Diego Regional Board was notified to follow up on this issue as warranted.

The County continues to see a high level of cooperation at industrial facilities within its jurisdiction. County staff has observed an increase in knowledge and awareness of staff assigned to NPDES programs at most of these industrial facilities which has resulted in improved BMP implementation (Level 3 Outcome) and anticipated reduced pollutant loads from sources (potential Level 4 Outcome).

The industrial inspection information and database is updated on an ongoing basis and is provided to the Regional Boards as part of the PEA. In addition, industrial inspection data for the Santa Ana Region is incorporated into the Quarterly Summary of Inspections that is submitted to the Regional Board. Inspection information tracked in the database includes, at a minimum, inspection dates, inspectors present and the results of the inspection. The updated inspection database is stored in MS4Web through the website links provided in **Section C-9.2.2** above.

C-9.2.7 BMP Implementation

As part of the industrial facility inspections, the County inspector determines the level of BMP implementation and also assesses the effectiveness of implemented BMPs. To facilitate this process, the County's inspection form is broken down by facility activity types based on the industrial/commercial BMP fact sheets IC1 - IC24.

The inspector may encounter situations where BMPs are in place but are not effectively applied, or where housekeeping adjustments would improve the overall BMP implementation. If BMP improvements are needed, the inspectors are trained to use their best professional judgment in deciding how much time to allow the owner or facility operator to correct the deficiency. The inspectors may verify the BMP implementation through a variety of means, including directions in the routine inspection report, requesting appropriate verification from the property owner (such as photo-documentation), and/or additional routine/follow-up inspections. Certain industrial sites are routinely inspected on an annual basis to ensure proper BMP implementation.

A summary of BMP implementation based on County inspections conducted during the current reporting period is provided below (Santa Ana Regional Board's inspection of the Merlex Stucco site is also included):



SECTION C-9, Existing Development

2011-12 Watershed Summary of BMP Implementation at Industrial Sites

4

San Diego Region

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams
Number of industrial facilities with BMPs fully implemented	9	1	2
Number of industrial facilities with BMPs partially implemented	1	0	0
Number of industrial facilities with no BMPs	0	0	0

Santa Ana Region

Watershed	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay
Number of industrial facilities with BMPs fully implemented	2	0	3	2
Number of industrial facilities with BMPs partially implemented	0	0	0	0
Number of industrial facilities with no BMPs	0	0	0	0

The County identified additional improvements needed for existing BMPs at a number of industrial sites in the San Diego Region. These issues were primarily addressed through the annual on-site inspection and directions in the inspection report to ensure full BMP implementation at these facilities. The County has noted the Ewles Materials site as having partial BMP implementation due primarily to housekeeping issues and materials storage practices. The County addressed these issues in its annual inspection for 2011-12, and will continue to incorporate Ewles Materials into its annual inspection program for 2012-13 to ensure proper BMP implementation. Conversely, one example of a success story is the Dana Point Shipyard, which received the California Clean Marina Facility Certification from the American Boat Builders and Repairers Association in 2012. This certification is based on meeting numerous environmental requirements, achieving various compliance standards and BMPs, as well as passing a facility verification inspection by the awarding association.



SECTION C-9, Existing Development

C-9.2.8 Enforcement



The County's Authorized Inspectors (identified in **Section C-10** of this PEA) undertake enforcement activities against industrial facilities according to the County and OCFCD Water Quality Ordinances and the accompanying Enforcement Consistency Guide (**Exhibit 4.I** of the **2003 DAMP**).

Enforcement may be handled administratively or in more serious instances, through legal prosecution. As provided for in the Enforcement Consistency Guide, when selecting enforcement options, the County's inspectors ensure that violations of a comparable nature are subjected to similar types of enforcement remedies. More severe enforcement options may be selected when a violator has a history of deficiencies, has failed to take good faith actions to eliminate continuing violations, and/or has not met a previously imposed schedule for addressing violations.

2011-12 Summary of Enforcement Actions for Industrial Facilities

Watershed	Number of Notices of Non-Compliance Issued	Number of Administrative Compliance Orders Issued	Number of Cease & Desist Orders Issued	Number of Facilities Referred for Criminal Remedies
N/A	0	0	0	0

The County has not observed violations of its ordinances during the reporting period. The County did refer two issues to the San Diego Regional Board for follow up: 1) ensuring full SWPPP implementation at the CR&R composting facility expansion (see **Section C-9.2.6**), which is beyond the scope of the County's ordinance authority; and 2) the potential need for the Greenstone Materials site to file an NOI for the Industrial General Permit (see **Section C-9.2.2**). With the exception of the issues discussed above, the County has not identified facilities in its jurisdiction that may require coverage under the Industrial General Permit, but have not submitted an NOI.

C-9.2.9 Reporting

For facilities that pose an imminent threat to human health or the environment, the County provides oral or e-mail notification to the Regional Board within 24 hours. Following initial 24 hour notification, the County sends a written report within 5 days detailing the nature of the threat and any corrective action taken. In addition, the County provides quarterly updates to the Santa Ana Regional Board regarding stormwater information gathered during site inspections of industrial facilities that are, or should be, regulated by the Industrial General Permit.

During the 2011-12 reporting period, the County identified no incidents during industrial inspection activities within its inventory that required notification of the Regional Boards due to



SECTION C-9, Existing Development

an imminent threat to human health or the environment. Reporting of enforcement actions and related issues are discussed in **Section C-9.2.8**.

C-9.2.10 Training

Training and outreach for the Industrial Program is done concurrently with the Commercial Program. These efforts are summarized in **Section C-9.3.9**.

C-9.3 Commercial Program (LIP Section A-9.2)

C-9.3.1 Organization Chart

Figure A-9.1 of the LIP provides an organizational chart that identifies which County Departments are responsible for overseeing, implementing, and enforcing the Commercial Program.

C-9.3.2 Inventory

The County has developed a watershed based inventory of specific commercial sites/sources within its jurisdiction as required by the Fourth Term Permits. This inventory is updated on an ongoing basis (quarterly at minimum) and includes relevant information on ownership, size, location, etc. of commercial facilities in the unincorporated areas. Summaries of the commercial inventory are provided below in the following tables:

2011-12 Commercial Site/Source Inventory Summary

Commercial Site/Source (by Permit Category)	Santa Ana Region (By Watershed)				San Diego Region (By Watershed)				Totals
	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay	Aliso Creek	Laguna Coast	San Juan Creek	Dana Point Coastal Streams	
Transport, storage or transfer of pre-production plastic pellets	0	0	0	0	0	0	0	0	0
Automobile mechanical repair, maintenance, fueling, or cleaning	5	29	2	0	0	0	4	0	40
Airplane repair, maintenance, fueling, or cleaning	0	0	0	0	0	0	0	0	0



SECTION C-9, Existing Development

Boat repair, maintenance, fueling, or cleaning	0	0	0	0	0	0	0	0	0
Equipment repair, maintenance, fueling, or cleaning	0	0	0	0	0	0	0	0	0
Automobile and other vehicle body repair or painting	0	5	0	0	0	0	0	0	5
Mobile automobile or other vehicle washing	0	0	0	0	0	0	0	0	0
Automobile (or other vehicle) impound, parking lots, and storage facilities	0	1	2	0	0	0	0	0	3
Retail or Wholesale Fueling	0	0	0	0	0	0	0	0	0
Pest control services and service facilities	0	0	0	0	0	0	0	0	0
Eating or drinking establishments, including food markets and restaurants* (Food Facilities)	6	6	9	38	2	0	48	20	129
Mobile carpet, drape, or furniture cleaning	0	0	0	0	0	0	0	0	0
Cement mixing or cutting	0	0	0	0	0	0	0	0	0
Mobile high pressure or steam cleaning	0	0	0	0	0	0	0	0	0
Masonry	0	0	0	0	0	0	0	0	0
Painting and coating	0	0	0	0	0	0	0	0	0
Botanical or zoological gardens and exhibits	0	0	0	0	1	0	0	0	1
Landscaping (and Hardscape Installations)	1	0	1	0	0	0	0	0	2
Nurseries and greenhouses	1	1	3	0	0	0	5	0	10
Golf courses, parks and other recreational areas/facilities	0	0	3	1	1	2	33	0	40
Cemeteries	0	0	0	0	0	0	0	0	0



SECTION C-9, Existing Development

Pool, lake and fountain cleaning	0	0	0	0	0	0	0	0	0
Marinas	0	0	0	0	0	0	0	0	0
Portable sanitary service facilities	0	0	0	0	0	0	0	0	0
Building material retailers and storage	0	2	0	0	0	0	0	0	2
Animal facilities (includes animal facilities such as petting zoos and boarding and training facilities)	0	3	3	1	0	0	3	0	10
Mobile pet services	0	0	0	0	0	0	0	0	0
Power washing services	0	0	0	0	0	0	0	0	0
Other commercial sites/sources determined to be significant contributors of pollutants to the MS4, or with a history of unauthorized discharges	0	0	5	0	0	0	0	0	5
Facilities tributary to 303(d) water body for pollutant generated on-site	0	0	0	0	1**	0	0	0	1
Facilities within/directly adjacent or discharging directly to ESA	0	0	0	0	0	0	0	44***	44
Sites and sources tributary to and within 500 feet of ASBS	0	0	0	0	0	0	0	0	0
Total for all Categories	13	47	28	40	5	2	93	64	292

Notes: * This list is for solely eating and drinking facilities. If a commercial site primarily falls into another inventoried category and happens to have a secondary food facility on-site, this facility is inventoried in its primary category. An example would be a golf course with a snack shop, which is inventoried as a golf course. The County will still monitor the Orange County Health Care Agency's NPDES inspection results related to these secondary food facilities.

** This listing refers to the Santiago Ranch Stables leasehold upstream of Aliso Creek, which could also be considered an Animal Facility in the San Diego Region. For classification purposes, the 303(d) listing takes priority over the Animal Facilities classification.

*** These 44 listings are in reference to the Dana Point Harbor ESA. Dana Point Harbor commercial facilities have other varying sub-classifications, but these sites have been inventoried as ESA priority within the County's commercial inventory. County staff confirmed the current leaseholds in its jurisdiction as part of its 2011-12 inventorying tasks in the San Diego Region.



SECTION C-9, Existing Development

Following adoption of the Fourth Term Permits in both regions, the County's commercial site/source inventory was thoroughly evaluated and re-inventoried to incorporate new commercial categories and address changes in commercial development in the unincorporated areas. In addition, the County coordinated with the cities on inventorying requirements for commercial facilities leased on County owned property located within city boundaries. This project continued in the 2011-12 reporting period, when a full reconnaissance of all commercial and industrial sites was carried out to help confirm their location, active status, commercial classification, and priority (Santa Ana Region). As a result of this detailed review, the commercial inventory totals for the County have been modified further from 315 in 2010-11 to 292 in 2011-12.

As with previous years, the inventory is updated on an ongoing basis within the LIP and provided to the Regional Boards on an annual basis as part of the PEA. The industrial/commercial data set is currently managed through a web-based GIS database called MS4Web, which is discussed in **Section C-9.2.2**. Many of the changes that occur to the inventory are related to businesses opening and closing in the unincorporated areas. However, additional reduction to the non-food facility commercial inventory occurred in 2011-12 related to the annexation of certain areas from the County to city jurisdictions in the Santa Ana Region, thereby reducing the unincorporated commercial inventory. These annexation areas included the transfer of Sunset Beach from the County to the City of Huntington Beach and the transfer of Kermore Island from the County to the City of Stanton. In addition, the County documented that the City of Fountain Valley incorporated additional business addresses along Harbor Boulevard northwest of the Santa Ana River crossing that were previously considered unincorporated.

C-9.3.3 Prioritization

Within the Santa Ana Region, the County prioritized commercial sites/sources as high, medium, or low based on their respective threat to water quality. Eating or drinking establishments are inspected routinely by HCA, and these sites are inventoried separately from the commercial facility prioritization. The County's commercial site/source prioritization distribution by Santa Ana Region watershed is provided in the following table:



SECTION C-9, Existing Development

2011-12 Summary of Commercial Site/Source Distribution by Watershed

Commercial Site/Source Prioritizations by Watershed	Santa Ana Region				Totals
	San Gabriel River/Coyote Creek	Anaheim Harbor/ Huntington Harbor	Santa Ana River	Newport Bay	
Total High Priority Sites	1	5	3	1	10
Total Medium Priority Sites	2	5	8	0	15
Total Low Priority Sites	4	31	8	1	44
Subtotal of Prioritized Sites	7	41	19	2	69
Number of Eating or Drinking Establishments	6	6	9	38	59
Total Number of Facilities	13	47	28	40	128

Fourth Term Permit requirements in the Santa Ana Region specify that a minimum of 10% of the non-food facility commercial inventory be designated as high priority, and 20% of the non-food facility commercial inventory be prioritized as medium. As indicated in the Santa Ana Region table above, the County prioritized 10 out of 69 commercial sites as high (14.5%), 15 out of 69 commercial sites as medium (21.7%), and 44 out of 69 sites as low (63.8%). While the non-food facility inventory decreased in 2011-12, the number of food facilities inventoried has increased in Newport Bay watershed due to the expansion and/or renovation of restaurant facilities at John Wayne Airport. This has resulted in 18 new Newport Bay watershed food facilities that have been incorporated into the HCA inspection program entering 2012-13.

Within the San Diego Region, Fourth Term Permit requirements do not specify designation of high, medium, or low categories for commercial sites/sources. Instead, the commercial sites (excluding eating or drinking establishments) are combined with the industrial inventory (13 industrial facilities) to develop an inspection frequency of at least 20% of the inventory. The County's commercial site/source distribution by San Diego Region watershed is provided in the following table:



SECTION C-9, Existing Development

Commercial Site/Source Distribution by Watershed (No Prioritization Required)	San Diego Region				
	Aliso Creek	Laguna Coast	San Juan Creek	Dana Point Coastal Streams	Totals
Total Commercial Sites (excluding Eating or Drinking Establishments)	3	2	45	44	94
Number of Eating or Drinking Establishments	2	0	48	20	70
Total Number of Facilities	5	2	93	64	164

Mobile businesses are addressed through the Countywide Mobile Business Pilot Program. Efforts of the Countywide Mobile Business Pilot Program are summarized in the 2011-12 Unified Annual Report. Additional details on the County's Mobile Business inventory and practices are included in **Section C-9.6**.

C-9.3.4 BMP Fact Sheets

As indicated in **Section C-9.2.5**, the activity-based Industrial/Commercial fact sheets developed as part of the Existing Development Program are numbered IC1 - IC24 and are included as **Exhibit A-9.II** of the County's LIP.

C-9.3.5 Inspections

The County inspects active commercial sites/sources in its inventory at the frequency shown in the following table (excluding eating or drinking establishments), which is also included in the County's LIP:

Commercial Inspection Frequency

Priority	Santa Ana Region	San Diego Region
High	Annually - Minimum of 10%	<u>No Prioritization Required:</u> A minimum of 20% of the combined Industrial/Commercial Inventory must be inspected annually.
Medium	Biennially - Minimum of 20% (Once every 2 years)	
Low	Once Per Permit Cycle (Once every 5 years)	

The number of commercial sites/sources inspected during the 2011-12 reporting period by commercial facility type is presented in the following table:



SECTION C-9, Existing Development

2011-12 Jurisdictional Summary of Commercial Site/Source Inspections



Commercial Site/Source Category	Santa Ana Region	San Diego Region
	Number of Sites/Sources Inspected in 2011-12	
Transport, storage or transfer of pre-production plastic pellets	0	0
Automobile mechanical repair, maintenance, fueling, or cleaning	6	1
Airplane repair, maintenance, fueling, or cleaning	0	0
Boat repair, maintenance, fueling, or cleaning	0	0
Equipment repair, maintenance, fueling, or cleaning	0	0
Automobile and other vehicle body repair or painting	0	0
Mobile automobile or other vehicle washing	0	0
Automobile (or other vehicle) impound, parking lots, and storage facilities	0	0
Retail or wholesale fueling	0	0
Pest control services and service facilities	0	0
Eating or drinking establishments, including food markets and restaurants* (Food Facilities)	30*	65*
Mobile carpet, drape, or furniture cleaning	0	0
Cement mixing or cutting	0	0
Mobile high pressure or steam cleaning	0	0
Masonry	0	0
Painting and coating	0	0
Botanical or zoological gardens and exhibits	0	0



SECTION C-9, Existing Development

Landscaping (and hardscape installations)	1	0
Nurseries and greenhouses	0	0
Golf courses, parks and other recreational areas/facilities	3	8
Cemeteries	0	0
Pool, lake and fountain cleaning	0	0
Marinas	0	0
Portable sanitary service facilities	0	0
Building material retailers and storage	0	0
Animal Facilities (includes animal facilities such as petting zoos and boarding and training facilities)	0	0
Mobile pet services	0	0
Power washing services	0	0
Other commercial sites/sources determined to be significant contributors of pollutants to the MS4, or with a history of unauthorized discharges	2	0
Facilities tributary to 303(d) water body for pollutant generated on site	0	0
Facilities within/directly adjacent or discharging directly to ESA (San Diego Region/Dana Point Harbor Commercial Sites)	0	44
Sites and sources tributary to and within 500 feet of ASBS	0	0
Industrial Facility Inspection Totals (San Diego Region)	N/A	13
Subtotal of Required Inspections Completed (Excluding Eating or Drinking Establishments)	12	66**
Total Inventory (Excluding Eating or Drinking Establishments)	69	107**

*HCA provides annual NPDES commercial inspection services for eating or drinking establishments countywide and maintains records associated with the inspection totals and results. Both the Santa Ana and San Diego Region Fourth Term Permits exclude restaurants/food facilities from determining the entire total of inspections.

**Combined industrial and commercial inspections per San Diego Region permit requirements.



SECTION C-9, Existing Development

The results tabulated above indicate that the County conducted 12 commercial inspections out of a possible 69 facilities in the Santa Ana Region (excluding eating and drinking establishments) during the 2011-12 reporting period. These 12 commercial inspections included all 10 high priority sites and 2 medium priority facilities. This represents full completion of the necessary inspections for year three of the Fourth Term Permit in the Santa Ana Region.

The County conducted 66 commercial site inspections within the 2011-12 reporting period within the San Diego Region. By combining these 53 commercial inspections with the 13 industrial inspections, a total of 66 inspections were conducted out of a combined commercial/industrial inventory of 107 facilities (excluding eating or drinking establishments from this calculation). Based on these totals, a total of 62.6% of the inventory was inspected, which exceeds the Fourth Term Permit requirement of 20%. This number is higher than required in part because the County has begun incorporating annual NPDES commercial inspections as part of the lease agreement inspections for facilities within Dana Point Harbor. As a result, the County conducted 44 annual inspections non-food facility sites within Dana Point Harbor, which increased the overall inspection percentage to 62.6%.

The following table summarizes the percent of required inspections completed by the County for the 2011-12 reporting period:

2011-12 Commercial Inspection Frequency Percent Completed*

Priority	Santa Ana Region	San Diego Region
High	100%**	62.6%***
Medium	13.3%	
Low	0%	

* Excludes eating or drinking establishments

** The Fourth Term Permit's year three requirements are to inspect 100% of high priority commercial facilities within the Santa Ana Region. A portion of medium priority commercial sites were also inspected in the Santa Ana Region that were added in 2010-11 to meet the requirement of inspecting sites within 2 years of addition to the inventory.

*** The Fourth Term Permit's annual requirement is to inspect at least 20% of the combined commercial/industrial inventory in the San Diego Region, with no prioritization required.

The County tracks commercial facilities that warranted additional investigation due to BMP deficiencies or other issues observed during the initial commercial facility inspection. This includes NPDES observations noted by HCA during inspections of eating and drinking establishments in the County's unincorporated jurisdiction. The number of commercial sites/sources that warranted additional investigation in 2011-12, including eating and drinking establishments, is presented below along with data on follow-up actions taken. The total number of commercial program inspections for 2011-12 is 160, which is calculated by adding the total number of eating and drinking establishments inspections from each region (30 and 65,



SECTION C-9, Existing Development

respectively) to the subtotal of required commercial inspections completed for non-food facilities (12 and 53, respectively).

2011-12 Summary of Additional Investigations by Watershed

2

Watershed	Number of Commercial Sites/Sources that Warranted Additional Investigation after Initial Inspection		
	2011-12	2010-11	2009-10
Aliso Creek	0	1	2
Laguna Coast	0	0	0
Dana Point Coastal Streams	8	8	7
San Juan Creek	32	20	16
Anaheim Bay/ Huntington Harbour	5	7	2
Newport Bay	3	3	1
San Gabriel River / Coyote Creek	0	1	1
Santa Ana River	5	6	5
Totals	54	46	34
Percentage of Commercial Sites/Sources that Warranted Additional Investigation after Initial Inspection			
2011-12	2010-11	2009-10	
34% (54 of 160 inspections)	30% (46 of 155 inspections)	30% (34 of 114 inspections)	



SECTION C-9, Existing Development

Watershed	Number of Commercial Sites/Sources with Follow-Up Action and/or Re-Inspection		
	2011-12	2010-11**	2009-10**
Aliso Creek	0	0	1
Laguna Coast	0	0	0
Dana Point Coastal Streams	6	0	0
San Juan Creek	28	8	1
Anaheim Bay / Huntington Harbour	5	5	1
Newport Bay	2	0	0
San Gabriel River / Coyote Creek	0	1	0
Santa Ana River	4	1	0
Totals	45*	15	3
Percentage of Commercial Sites/Sources with Follow-Up Action or Re-Inspection Due to Initial Deficiencies			
2011-12	2010-11	2009-10	
28.1%*	10%**	3%**	

*This total reflects that 45 out of 54 observed sites with initial deficiencies on the commercial inspections resulted in further action such as re-inspection. The remaining 9 sites represent duplications from multiple HCA inspections during 2011-12, or sites where a follow-up NPDES inspection by HCA did not identify a deficiency for the facility. The percentage shown indicates 45 out of 163 total inspections (28.1%) resulted in a follow up action and/or re-inspection.

**Historically, this PEA table has focused on re-inspection totals, which shows a lower percentage response. Since the County utilizes multiple approaches to follow-up with commercial sites with deficiencies, this table has been updated for 2011-12 to reflect all follow-up actions by the County. Additional details on these types of follow-up actions are below.

The percentage of commercial sites warranting additional investigation based on the initial inspection was 34% (54 of 160 inspections) in the 2011-12 reporting period, which is similar to the 30% (46 of 155 inspections) noted for 2010-11 and 30% noted in 2009-10 (34 of 114 inspections). As with previous years, the majority of these issues were observed at eating or drinking establishments in commercial shopping centers. The County coordinates responses on these food facilities through the following mechanisms (not all responses require follow-up field inspection to resolve the issue):

- Many of the businesses listed above are restaurants/food facilities that are receive NPDES deficiencies from HCA for failing to properly manage their trash bins/refuse containers. A



SECTION C-9, Existing Development

typical follow-up response to this type of deficiency may include a re-inspection of the food facility with the business owner and/or property manager for the commercial center. Since many of these eating or drinking establishments share a common dumpster with other commercial retail businesses, the County has learned that a highly effective means of addressing the issue is to work with the property management company in addition to the individual food facility manager to resolve potential deficiencies. For example, the County is in regular contact with property managers for commercial plazas in Ladera Ranch, and it works directly with these entities to resolve issues as they arise.

- In other instances, a lack of grease records may be noted by the HCA inspector. In these cases, the County sends a letter to the site requesting that records be maintained and made available during inspections. In certain cases, verification of the records is requested from the business owner.
- For circumstances involving an illegal discharge from a food facility, such as washing down materials into the storm drain system, the County typically conducts follow-up inspections of the commercial facility to ensure proper BMP implementation.
- Deficiencies at leased commercial sites within Dana Point Harbor are referred to Dana Point Harbor Department inspectors, who enforce on these issues as part of the County's lease agreements with the tenants.
- In certain cases, an enforcement action is needed to address violations of the County and/or OCFCD Water Quality Ordinance. Enforcement actions completed in 2011-12 are summarized in **Section C-9.3.7**.

C-9.3.6 BMP Implementation

As part of commercial facility inspections, the County inspectors determine the level of BMP implementation and also assess the effectiveness of the implemented BMPs. The inspector may encounter situations where BMPs are in place but are not effectively applied. The inspectors are trained to use their best professional judgment and decide how much time to allow the owner/operator to correct the issue. A summary of BMP implementation based on County inspections (including eating and drinking establishments) is provided below.



SECTION C-9, Existing Development

2011-12 Watershed Summary of BMP Implementation at Commercial Sites

2

Watershed	Number of Facilities with BMPs Fully Implemented	Number of Facilities with BMPs Partially Implemented	Number of Facilities With No BMPs or BMPs Not Fully Implemented	Number of Facilities Required to Implement or Upgrade/Modify BMPs
Aliso Creek	1	0	0	0
Laguna Coastal Streams	0	0	0	0
Dana Point Coastal Streams	52	6	0	6*
San Juan Creek	19	28	0	26**
Anaheim Bay/ Huntington Harbour	5	5	0	5
Newport Bay	11	3	0	2**
San Gabriel River/Coyote Creek	4	0	0	0
Santa Ana River	7	3	0	3
Totals	99	45	0	42
Percentage of Facilities Required to Implement or Upgrade/Modify BMPs				
2011-12	2010-11		2009-10	
26% (42 of 160 inspections)	15% (23 of 155 inspections)		30% (34 of 114 inspections)	

*HCA restaurant/food facility deficiencies are reported to Dana Point Harbor Department for follow-up. These businesses are routinely inspected for a variety of issues (including NPDES) by staff as part of their ongoing leases.

**The County conducted follow-up work related to commercial sites with partial BMP investigation (primarily HCA restaurant/food facility inspection deficiencies). Some investigations are ongoing issues that remain pending.

C-9.3.7 Enforcement

The County's Authorized Inspectors (Identified in **Section C-10** of this PEA) undertake enforcement activities according to the County and OCFCD's adopted Water Quality Ordinances and the accompanying Enforcement Consistency Guide. The enforcement mechanisms available are summarized in this section and detailed in the County's LIP. Water pollution enforcement may be handled administratively, or, in more serious instances, be prepared for criminal prosecution. As provided for in the Enforcement Consistency Guide (**Exhibit 4.I of the 2003 DAMP**), when selecting enforcement options, the County's Authorized Inspectors ensure that violations of a similar nature are subjected to similar types of



SECTION C-9, Existing Development

enforcement remedies. More severe enforcement options may be selected when a violator has a history of deficiencies, has failed to take good faith actions to eliminate continuing violations, and/or has not met a previously imposed schedule for addressing violations.

During the 2011-12 reporting period, the County took the following enforcement actions against commercial sites/sources within its inventory:

2011-12 Summary of Enforcement Actions



Watershed	Number of Educational Letters Sent	Number of Notices of Non-Compliance Issued	Number of Administrative Compliance Orders Issued	Number of Facilities Referred for Criminal Remedies
Aliso Creek	0	0	0	0
Laguna Coastal Streams	0	0	0	0
Dana Point Coastal Streams	0	0	0	0
San Juan Creek	0	1	0	0
Anaheim Bay/ Huntington Harbour	1	0	0	0
Newport Bay	2	0	0	0
San Gabriel River/Coyote Creek	0	0	0	0
Santa Ana River	0	0	0	0
Totals	3	1	0	0

The County has transitioned to a standard "Records" enforcement/educational letter when a lack of grease interceptor maintenance records is the only issue identified at a restaurant. The County has found that this enforcement action has resulted in better upkeep of maintenance records (Level 3 Outcome) which translates to less potential for the grease interceptors to become a source of pollutants (Level 4 Outcome).

The one Notice of Non-Compliance issued during 2011-12 was related to a restaurant facility's management practices of their trash bin enclosure in the San Diego Region. The issue was also resolved by re-inspection of the site following the initial HCA inspection report.

C-9.3.8 Reporting

For facilities that pose an imminent threat to human health or the environment, the County provides oral or e-mail notification to the Regional Board within 24 hours. Following initial 24



SECTION C-9, Existing Development

hour notification, the County sends a written report within 5 days detailing the nature of the threat and any corrective action taken.

During the 2011-12 reporting period, the County identified no incidents during commercial inspection activities within its inventory that required notification of the Regional Boards due to an imminent threat to human health or the environment. Reporting of enforcement actions are discussed in **Section C-9.3.7**.

C-9.3.9 Training and Outreach

Training



The County as Principal Permittee sponsored training to assist municipal staff in understanding the industrial and commercial components of the Existing Development Program. County Authorized Inspector participation in training conducted during the reporting period is summarized in the following table, which is based on the quarterly Inspection Sub-committee meetings:



SECTION C-9, Existing Development

2011-12 Summary of Existing Development Program Training

Meeting	Training	Training Dates	Agency	Trainer	Number of County Attendees
Countywide NPDES Inspection Sub-committee	Non-stormwater Action Levels and Follow-up Investigations	August 4, 2011	OC Public Works	Richard Boon	8
	SAR MS4 NOV Alerts	August 4, 2011	OC Public Works	Duc Nguyen	8
	Regional Board Staff Strategies for Industrial Facility Inspections	December 8, 2011	Santa Ana Regional Board	Adam Fischer	7
	Roundtable Discussion of Recent Pollution Incidents/Cases	December 8, 2011	OC Public Works	Group Panel (Duc Nguyen overseeing)	7
	2010-11 PEA - Inspection Data Overview	February 2, 2012	OC Public Works	Christy Suppes	5
	L01S02 Pollutant Source Investigation	February 2, 2012	City of Dana Point	Lisa Zawaski	5
	NPDES Permit Notification Requirements	February 2, 2012	OC Public Works	Duc Nguyen	5
	DAMP Update: Sections 9 & 10	June 7, 2012	OC Public Works	Christy Suppes	6
	Inspector Awareness - Hostile Situations	June 7, 2012	OC District Attorney's Office	James McConnell	6
	Industrial Stormwater Management and Compliance at John Wayne Airport	June 7, 2012	John Wayne Airport	Maria Pope	6
OC Public Works O&M Meeting	NPDES Pollution Incident Response Training	December 14, 2011	OC Public Works	Duc Nguyen, James Fortuna	24



SECTION C-9, Existing Development

Additional training efforts are included in **Section C-2** of the PEA.

Outreach

The County continued to conduct outreach activities with industrial and commercial businesses within its jurisdiction to inform them of their responsibilities under this program. During the 2011-12 reporting period, this outreach effort included:

- Distribution of brochures, posters and the industrial/commercial BMP fact sheets through the website, field inspectors, at public facilities counters, etc.
- Posting information on the Existing Development Program (including the activity-based BMP fact sheets) on the County's website, www.ocwatersheds.com.
- Additional outreach items are included in **Section C-6.3** of the PEA.

C-9.4 Residential Program (LIP Section A-9.3)

C-9.4.1 Organization Chart

Through its organization chart, **Figure A-9.2** of the LIP, the County identified which Departments are responsible for the implementation of the Residential Program.

C-9.4.2 Inventory

The County maintains a watershed-based map of residential areas within its jurisdiction, including using the GIS capabilities of the online MS4Web database. Residential areas that discharge directly to an ESA may be targeted for enhanced implementation of BMPs based on the activities of concern that are identified.

C-9.4.3 BMP Fact Sheets

BMP fact sheets have been developed as a part of the Existing Development Program. The fact sheets include a description of specific BMPs for high threat residential activities that may cause the discharge of pollutants and provide a focus on the pollution prevention measures that the facility should implement. The activity-based residential fact sheets are numbered R1 – R8 and are included as **Exhibit A-9.II** of the County's LIP. There were no modifications to the fact sheets during the reporting period.

The County has identified the following potential areas and activities that pose a high threat to water quality and/or potential sources of pollutants by following the procedure outlined in **DAMP Section 9.5.2**.

- Residential automobile repair, maintenance, washing, and parking;
- Home and garden care activities and product use (including the use and disposal of pesticides, herbicides, and fertilizers);
- Collection and disposal of trash, pet waste, green waste, and household hazardous waste (e.g., paints, household cleaning products);



SECTION C-9, Existing Development

- Any other residential source that the County determines may contribute a significant pollutant load to the MS4;
- Any residential areas tributary to a CWA section 303(d) impaired water body, where the residence generates pollutants for which the water body is impaired; and
- Any residential areas within or directly adjacent to or discharging directly to a coastal lagoon, the ocean, or other receiving waters within an environmentally sensitive area.

These residential activities are assumed to occur with equal likelihood in all residential areas within the County's jurisdiction. The implementation of the Residential Program is designed to address these activities on a countywide basis.

C-9.4.4 Enhanced Implementation

The County evaluated its residential BMPs as part of the LIP update in the 2011-12 reporting year. Based on an assessment of these factors, updates to the minimum designated residential BMPs were not required.

With the onset of Non-Stormwater Action Levels (NALs) monitoring program in the San Diego Region during 2011-12, the County has focused on pollutants within primarily residential (and CIA/HOA) sub-watersheds of Coto de Caza and Ladera Ranch. Details on the NALs monitoring program can be found in **Sections C-10** and **C-11** of this PEA.

C-9.4.5 Water Pollution Complaints/Incidents

The Residential Program relies upon observations by municipal employees working in or assigned to residential areas and on complaints received from the public through the water pollution problem reporting hotline and website.

The County tracks water pollution complaints under the ID/IC program and provides a summary of the number of complaints received, including residential runoff enforcement actions, and the source area associated with the complaint (e.g. commercial business, resident, etc.). These incidents are maintained in the County's MS4Web database. Additional information on residential enforcement is provided as part of **Section C-10** of this PEA.

C-9.4.6 Enforcement

Enforcement actions taken by the County throughout its jurisdiction, including those against individual residents, are summarized in **Section C-10** of this PEA.

C-9.4.7 Outreach and Training

Outreach

Education and outreach targeted towards residents is a major component of the Residential Program. The County encourages the implementation of a set of designated BMPs for residents. The BMPs are presented in a series of fact sheets specific to high threat residential activities.



SECTION C-9, Existing Development

The County has developed outreach efforts to encourage the use of the designated BMPs. This outreach has included efforts such as mass media advertising campaigns, mailings, holding workshops, development and distribution of brochures, posters, fact sheets, posting information on the County's webpage, etc. Information on specific outreach efforts can be referenced in **Section C-6**.

Training

Successful implementation of the residential program relies on education of municipal employees that conduct activities in residential areas. For the County, it is primarily OC Public Works/Operations & Maintenance field program crews who are entering into residential areas on a routine basis to maintain the public infrastructure. Training efforts during the 2011-12 reporting period covering municipal activities are discussed in **Section C-5** of this PEA. While many of the field programs conducted by the County are inherently pollution prevention practices (such as street sweeping and drainage facility cleaning), the field program crews are trained to notify the County's Authorized Inspectors (identified in **Section C-10**) of any issues impacting or having the potential to impact runoff from residential areas.

C-9.5 CIA/HOA Program (LIP Section A-9.4)

C-9.5.1 Organization Chart

The County utilizes the LIP residential organization chart (**Figure A-9.2**) and **Section A.6** of the LIP to implement its CIA/HOA Program.

In addition, a pilot program has been developed to control pollutant discharges from CIAs and areas managed by HOAs or other management companies. These efforts are discussed in the 2011-12 Santa Ana Region Unified Annual Report.

C-9.5.2 Inventory

The County has developed a watershed-based map of residential and CIA/HOA areas within its jurisdiction in the San Diego Region. Residential areas that discharge directly to an ESA may be targeted for enhanced implementation of BMPs based on the activities of concern that are identified. The residential map is updated on an ongoing basis within the LIP and using the County's MS4Web online GIS database.

C-9.5.3 BMP Fact Sheets

BMP fact sheets have been developed as part of the Existing Development program. The fact sheets include a description of specific BMPs for high threat CIA/HOA activities that may discharge pollutants and provide a focus on the pollution prevention measures that the facility should implement. The activity based fact sheets that were developed are included in **Exhibit A-9.II** of the County's LIP. There were no modifications to the fact sheets during the reporting period.



SECTION C-9, Existing Development

C-9.5.4 Enforcement Actions

Enforcement actions conducted by the County throughout its jurisdiction, including CIA/HOA areas, are summarized in **Section C-10** of this PEA.

C-9.5.5 Outreach and Training

Outreach

As described in **Section C-9.4.7**, there are a number of ways in which the County performs general outreach to residents. CIA/HOA communities present a tremendous opportunity for outreach due to their organizational structure, and the County encourages and promotes distribution of stormwater education material through association newsletters, association websites, etc.

In addition to this outreach, the County interacted with CIA/HOA through other relevant programs. These interactions included direct inspections of CIA/HOA managed facilities such as commercial parks and common areas within CIA/HOA authority as part of the NALs and Existing Development programs. As part of these inspections, landscape/maintenance contractors for the HOAs were invited to present their on-site maintenance and irrigation practices, and associated BMP information was provided by the County to help manage runoff and stormwater pollution. The following HOAs were included in this outreach effort:

- LARMAC (Ladera Ranch)
- CZ Master Association (Coto de Caza)

The CIA/HOA outreach uses similar outreach techniques to the residential program such as mass media advertising, which is discussed in **Section 9.4.7**.

Training

Section 6.3.2 documents training efforts that included targeting CIA/HOA areas. As reported in past years, the County also utilizes a CIA/HOA training module in **Exhibit B-9.V** of the DAMP. This training module continues to be available on the County's website.

C-9.6 Mobile Business Program

The model Mobile Business Pilot Program was developed in 2009-10 by the Orange County Stormwater Program as part of the Fourth Term Permit implementation in both regions. The Mobile Business Pilot Program subsequently commenced in 2010-11 with the development of an online, countywide inventory and enforcement database that contains mobile business inventories for each jurisdiction in Orange County. Along with other city jurisdictions, the County supplied a list of mobile businesses for a variety of mobile business categories that are based and/or operating within its unincorporated area to initially populate the County's portion of the database. Additional progress for the overall Mobile Business Pilot Program was completed in 2011-12, including conducting a Mobile Automotive Detailing Workshop in



SECTION C-9, Existing Development

Fullerton in June 2012. The County will continue to work collaboratively with other cities on implementing this program, and additional details on the overall progress are reported in the 2011-12 Unified PEA.

The County currently inventories 58 mobile businesses based in its home unincorporated jurisdiction and 62 mobile businesses that operate in the unincorporated areas. The County continues to work on maintaining its mobile business inventory on an ongoing basis. New mobile businesses are identified through a variety of means including public outreach, complaint response, inquiries from mobile businesses on BMP requirements, and coordination with cities and regulatory agencies. As part of its efforts in 2011-12, the County did identify two issues recorded against mobile businesses operating in unincorporated areas:

- The San Diego Regional Board forwarded a complaint regarding Double A Mobile Detailing possibly discharging wash water to the storm drain in Ladera Ranch in June 2012. Further investigation of the issue did not confirm the discharge; however, the County issued BMP information and the Mobile Automotive Detailing Workshop brochure related to improper mobile detailing practices in June 2012. The business is based out of Anaheim's jurisdiction; however, the activity occurred within unincorporated Ladera Ranch.
- Jimmy's Auto Detailing was issued a Notice of Non-Compliance and BMP information related to improper mobile detailing practices in June 2012. The business is based out of Mission Viejo's jurisdiction; however, the activity occurred within unincorporated Ladera Ranch.

C-9.7 Post-Construction BMP Inspection and Verification for Existing Development

The County's WQMP inventory is updated on an ongoing basis and made available to the Regional Boards for review. The inventory includes private sector industrial, commercial, residential, and CIA/HOA sites with approved WQMPs. In addition, the inventory also includes municipal facilities and public capital improvement projects with approved WQMPs and post-construction BMPs that warrant inventory and inspection under this program. The County's WQMP inventory and inspection information is managed through an online web-based database with Geographical Information System (GIS) capabilities called MS4Web. The County's WQMP inventory and post-construction BMP inspection/verification data is available through the following web links:

Website (WQMPs): <http://www.ms4web.com/base/wbin/Structures.aspx?ns=36>

User Name: PEA

Password: ocMS4!

As part of the BMP implementation task for industrial and commercial sites, the County incorporated WQMP verification inspections along with industrial/commercial inspections where feasible as part of its Existing Development component. For example, WQMP verification inspections of BMPs were conducted in 2012 at the following San Diego Region industrial sites as part of the industrial inspection process: CR&R (2006 Expansion Area),



SECTION C-9, Existing Development

Greenstone Materials (new facility), and the Prima Deshecha Landfill - Green Building Site (OC Waste & Recycling municipal facility). Additional information on these inspections is available in MS4Web.

The majority of the County's WQMPs for residential and CIA/HOA areas are associated with Ladera Ranch. As part of its planned efforts for 2012-13, the County will be working with LARMAC to conduct a regional verification strategy of the post-construction BMPs for the entire community.

C-9.8 Existing Development Program Modifications

The County has evaluated the Existing Development Program to determine if modifications are necessary. With the adoption of the Fourth Term Permits in each region, multiple changes to the Existing Development Program were conducted and expanded in 2011-12 to achieve full program implementation. Based on the County's evaluation, the program is achieving desired Outcome Levels.

As a split jurisdiction, the specific Existing Development Program requirements have become more divergent in the Fourth Term Permits between the Santa Ana and San Diego regions. Therefore, the County has separated its Santa Ana and San Diego region inventories and manages them independently of each other. The following observations were noted:

- The economic downturn has caused an increased turnover of commercial sites and food facilities across Orange County. In addition, the County is slowly transferring unincorporated areas (and associated existing development inventory) to city responsibility. During 2011-12, for example, the Sunset Beach unincorporated area became part of the City of Huntington Beach and the Kermore unincorporated area became part of the City of Stanton. Inventorying and prioritization of commercial sites has become a larger administrative burden for the County's program, particularly in the Santa Ana Region. Based on the size and scattered geographic distribution of the County's inventory, the San Diego Region requirement of inspecting 20% of the combined industrial/commercial inventory is a much simpler system for the County to manage than the Santa Ana Region's high/medium/low prioritization inspection requirements.
- Coordination with Regional Board staff on industrial inspections has been effective in avoiding inspection duplications. The County is tracking industrial inspections conducted by the Regional Boards in SMARTS, and appreciates coordinated inspection efforts with Regional Board staff when feasible.
- To improve on the current inventorying of industrial, commercial, residential, and CIA/HOA sites, the County implemented new database/GIS tracking methods using the MS4Web system and ArcGIS during 2011-12. These new GIS systems have helped the County better consolidate and track its inspection programs, and its use will likely expand in the 2012-13 reporting year.



SECTION C-9, Existing Development

Based upon the knowledge gained in preparing this PEA, the County will update Section A-9 of the County LIP. Modifications will primarily address the further implementation of the MS4Web database system and updates to the inventories for each region.

SECTION 9.0, EXISTING DEVELOPMENT

9.0 EXISTING DEVELOPMENT

9.1 Introduction

Stormwater discharges from commercial and industrial facilities can become contaminated when material management practices allow exposure to stormwater and/or there is commingling of runoff with wastes. The purpose of **DAMP Section 9.0** is to provide a programmatic framework for the regulatory oversight of activities in commercial and industrial areas. Through inspections, outreach and requiring compliance with water quality ordinances, the Permittees are able to pro-actively address the quality of urban and stormwater runoff from industrial and commercial facilities. In addition, **DAMP Section 9.0** also provides a programmatic framework, based upon education and outreach approaches, for addressing activities in residential areas. Both the industrial/commercial and residential elements were added to the Program by the Third Term Permits.

9.2 Accomplishments

9.2.1 Model Industrial/Commercial Program

The Model Industrial/Commercial Program was developed and implemented in 2002-03. It transformed the Permittees oversight of commercial and industrial facilities/activities by establishing a formal inspection program where previously there had been a series of notifications and inspections initiated by complaints. The Model Industrial/Commercial Program requires the Permittees to:

- Identify and inventory facilities/activities with the potential to discharge pollutants:

Initially, 8,546 industrial facilities (**Table 9.1; Figure 9.1**) and 22,789 commercial facilities were identified and inventoried (**Table 9.2; Figure 9.2**).

- Prioritize facilities based upon water quality threat and receiving water sensitivity:

The Permittees prioritized 8,546, 8,604 and 2,821 industrial facilities in 2002-03, 2003-04 and 2004-05 respectively. Concurrently, 22,789, 23,778, and 25,411 commercial facilities were similarly evaluated and prioritized over the same respective periods.

- Establish Model Maintenance Procedures:

Twenty-two (22) model BMP fact sheets have been prepared which include a description of specific minimum source control BMPs for common industrial and commercial activities that may discharge pollutants. Specific BMPs may be adjusted on a jurisdictional basis as necessary. Where applicable, optional controls have been identified that should be considered for implementation at high priority facilities.

Typically each fact sheet contains the following sections:

- Pollution Prevention

SECTION 9.0, EXISTING DEVELOPMENT

- Suggested Best Management Practices
 - Training
 - References and Resources
- Conduct inspections and monitoring to ensure that commercial and industrial facilities are minimizing their impacts on the environment:

In the 2002-03, 2003-04 and 2004-05 reporting periods the Permittees completed 1,017, 4,029 and 2,706 inspections, respectively.

- Conduct inspections of food facilities:

The Orange County Permittees developed and submitted a food facility inspection program to the Santa Ana Regional Board on July 1, 2002. This program, which also meets the inspection requirements of the San Diego Regional Board, involves inspections and the distribution of educational materials at the approximately 10,000 existing restaurants countywide. The implementation of the Program is an addition to the environmental health inspections conducted by the County of Orange Health Care Agency (HCA). The HCA inspectors identify NPDES issues during these inspections, and they are forwarded to the respective Permittees and addressed by Permittee staff.

For the 2004-05 reporting period, 25,078 food facility inspections were conducted and 1,416 were reported to have NPDES issues (**Table 9.3**).

- Undertake Non-compliance Notification and Enforcement:

Enforcement for the industrial and commercial component of the Existing Development Program is the responsibility of individual Permittees. Each Permittee has several different levels of enforcement to choose from for different types of situations. This includes – from least severe to most severe – issuance of an educational letter, a notice of non-compliance, an administrative compliance order, a cease and desist order, or a misdemeanor/infraction.

The Permittees reported a total of 371 enforcement actions against industrial facilities during the 2004-05 reporting period

- Participate in Training:

To assist municipal staff in implementing the Existing Development Program for industrial and commercial facilities, five training modules were developed:

1. Existing Development Program Management Module (targeting jurisdictional program coordinators and providing guidance regarding management of an inspection program;
2. Field Implementation of Existing Development Program Module (targeting inspectors and providing guidance on conducting inspections);

SECTION 9.0, EXISTING DEVELOPMENT

3. Existing Development Program Training – Automobile Mechanical Repair, Maintenance, Fueling and Cleaning Businesses Module;
 4. Existing Development Program Training – Landscape Maintenance Businesses Module, and
 5. Existing Development Program Training – Industrial Stormwater Monitoring Module.
- Conduct Education and Outreach:

A number of education and outreach efforts, conducted under the overall public education element of the Program (see **DAMP Section 6.0**), directly supported implementation of the Model Industrial Commercial Program, specifically:

Mailings – During 2003-05 there was one mass mailing of an outreach letter for corporate environmental managers of food service establishments (FSE) and one mass mailing of education materials to all Orange County FSEs.

Outreach Materials – The following materials were developed by the Public Education Committee supportive of **Section 9.0**:

Brochures

- *Mobile Detailing and the Water Quality Act*
- *Water Quality Guidelines for Exterior Restaurant Cleaning Operations*
- *Water Quality Guidelines for Carpet Cleaning Activities*
- *Help Prevent Ocean Pollution: Tips for Hardscape and Landscape Drains*
- *Help Prevent Ocean Pollution: Tips for Home Improvement*

Posters

- Food/Restaurant Industry
- “Help Prevent Ocean Pollution” Food Facility BMPs Poster
- Auto Repair Industry
- Good Gas Station Operating Practices

“The Quad” - “The Quad” was developed as a tool to communicate with Cities, Businesses, Utilities and Organizations. Each Quad contains a newsletter, press release, fact sheet and billing insert focusing on a seasonal stormwater theme. Four seasonal quads were created during this reporting period, two of which were distributed in this reporting period. The following were the 2004-05 Quad themes:

- “Spring Into Cleaning – Disposal of Household Hazardous Waste”
- “Summer: Yard Care”
- “Fall: Prepare for the Rainy Season”
- “Winter: New Years Resolution – Green in the New Year”

FSE Outreach – The following materials were developed specifically for FSEs.

SECTION 9.0, EXISTING DEVELOPMENT

- *"Help Prevent Ocean Pollution": A Guide for Food Service Establishments*
- *"Help Prevent Ocean Pollution" Food Facility BMPs Poster*
- *"Help Prevent Ocean Pollution" Food Facility BMPs Stickers*
- Bilingual CD-Rom illustrating appropriate Food Facility BMPs
- Food Facility BMP PowerPoint Presentation
- Food Facility BMP Fact Sheet

Other: Developed an urban nutrient outreach program targeting independent gardeners operating in the San Diego Creek/Newport Bay Watershed with Proposition 13 funding awarded to the County to investigate the sources of nutrients from the urban environment and test the effectiveness of structural and non-structural BMPs.

9.2.2 Model Residential Program

The Model Residential Program was developed and implemented in 2002-03 to further reduce pollutants potentially released into the environment from residential activities, including efforts to reduce over-watering. The main thrust of the residential program is to advocate pollution prevention practices as the most effective method to protect receiving water quality. The Model Residential Program requires the Permittees under the jurisdiction of the San Diego Regional Board to:

- Develop a source identification procedure and prioritize residential areas based on proximity to Environmentally Sensitive Areas (ESAs) within the Permittee's jurisdiction.
- Identify Best Management Practices (BMPs) most appropriate for each area, based on residential activities:

See discussion of Outreach Materials (below).

- Conduct public outreach and education:

A number of education and outreach efforts, conducted under the overall public education element of the Program (see **DAMP Section 6.0**), directly supported implementation of the Model Residential Program, specifically:

Outreach Materials -The following materials were developed by the Public Education Committee supportive of **Section 9.0**:

Brochures

- *Help Prevent Ocean Pollution: Tips for Hardscape and Landscape Drains*
- *Help Prevent Ocean Pollution: Tips for Horse Care*
- *Help Prevent Ocean Pollution: Tips for Using Paint*
- *Help Prevent Ocean Pollution: Tips for Home Improvement*

"The Quad" - "The Quad" was developed as a tool to communicate with

SECTION 9.0, EXISTING DEVELOPMENT

cities, businesses, utilities and organizations such as home owner associations. Each Quad contains a newsletter, press release, fact sheet and billing insert focusing on a seasonal stormwater theme. Four seasonal quads were created during this reporting period, two of which were distributed in this reporting period. The following were the 2004-05 Quad themes:

- "Spring Into Cleaning - Disposal of Household Hazardous Waste"
- "Summer: Yard Care"
- "Fall: Prepare for the Rainy Season"
- "Winter: New Years Resolution - Green in the New Year"

9.2.3 Other Programs

During the reporting period, the Principal Permittee developed an urban nutrient outreach program targeting residential gardeners operating in the San Diego Creek/Newport Bay Watershed. The outreach program was one element of a Proposition 13 funded investigation of nutrient sources in an urban environment and structural and non-structural BMP effectiveness.

9.3 **Assessment**

The current and potential Program Effectiveness Assessment Outcome Levels that could be assessed within the current program are summarized in **Table 9-4** (Industrial/Commercial) and **Table 9.5** (Residential).

9.3.1 Model Industrial/Commercial Program

Inventories: Completing the inventory of industrial and commercial facilities has been problematic for some jurisdictions since the Standard Industrial Classification (SIC) codes on the business licenses (the primary source of this information for those jurisdictions with a business license program) have been incorrectly provided by businesses.¹ In addition, inventorying commercial facilities is extremely difficult because they are numerous, often transitory, and can only be identified through site visits. Mobile businesses are particularly problematic because they typically do not have a permanent facility location.

The Unified Annual Progress Reports include tables reporting the total number of commercial and industrial facilities and their respective prioritizations, organized by

¹ The Notice of Intent (NOI) form attached to the Draft Industrial General Permit (February 2005) and the SWRCB's NOI processing system have been modified to accept both Standard Industrial Classification (SIC) codes and North American Industrial Classification System (NAICS) codes. The USEPA has indicated it intends to incorporate the NAICS codes into the storm water regulations but has not yet done so. The Proposed 2006 Multi-Sector General Permits for Stormwater Discharges Associated with Industrial Activity (MSGP) contains a note that "a complete list of SIC Codes (and conversions from the newer North American Industry Classification System [NAICS]) can be obtained from the Internet at www.census.gov/epcd/www/naics.html or in paper form from various locations in the document titled Handbook of Standard Industrial Classifications, Office of Management and Budget, 1987."

SECTION 9.0, EXISTING DEVELOPMENT

Permittee. However, since the structure and content of the jurisdictional databases can differ between the Permittees, analysis of data on a regional or countywide basis is challenging. Indeed, there appears to be a persistent disparity between the number of industrial and commercial facilities inventoried and the number of industrial and commercial facilities that were prioritized over the reporting period (see **Tables 9.1** through **9.3** and **Figures 9.1** through **9.2**). This disparity points to the need to augment facility descriptions beyond SIC codes.

DAMP Modification:

- Provide more detailed industrial and commercial facility descriptions to assist in inventory standardization.

Prioritization: Commercial and industrial facilities must be classified as high, medium, or low priority to determine the frequency of inspection. The DAMP details a risk and receiving water sensitivity based point system for classification, the result of which is a total score indicating the facility priority. A change in facility prioritization can be indicative of programmatic success, since a finding that BMPs are being implemented (a behavior change) reduces the risk of pollutants being discharged which can result in a change in prioritization. However, both Permits specify mandatory high-priority commercial and industrial facilities. In addition, the San Diego Region Permittees are required to inventory only high-priority commercial facilities i.e. there are no designation of medium and low priority commercial facilities.

Headline Indicator - Prioritization of Facilities (Industrial Facilities): For 2004-05, 2,821 industrial facilities were prioritized, 27% of which were ranked as high priority; for 2003-04, 8,604 industrial facilities were prioritized, 13% of which were ranked as high priority; and for 2002-03, 8,546 industrial facilities were prioritized, 15% of which were ranked as high priority (**Table 9.1; Figure 9.1**).

- ☒ Level 1: Implement Program
- ☒ Level 3: Behavior Change

Headline Indicator - Prioritization of Facilities (Commercial Facilities): For 2004-05, 25,411 commercial facilities were prioritized, 20% of which were ranked as high priority; for 2003-04, 23,778 commercial facilities were prioritized, 24% of which were ranked as high priority; and for 2002-03, 22,789 commercial facilities were prioritized, 22% of which were ranked as high priority (Table 9.2; Figure 9.2).

- ☒ Level 1: Implement Program
- ☒ Level 3: Behavior Change

The year-to-year comparisons suggest some inconsistent reporting of this indicator. Part of this inconsistency arises from the interpretation of the extent to which a facility "tributary to" a sensitive receiving water, which is a key determinant in prioritization. From the Annual Progress Reports (See **DAMP Appendix C**), it is evident that "tributary to" is variously being interpreted as more than "next to" but "less than the whole watershed." Also, although the point system is used by many of the Permittees, some perceive it as time-consuming and too subjective, and, as a result, may rely primarily on professional judgment. In addition, the ability of the prioritization process to meaningfully provide for a risk-based approach is also dampened by the requirements for mandatory high priority sites. Despite these reservations, it is possible that the decreased numbers of high priority sites in the most recent annual reporting period may also reflect increased findings of no stormwater exposures and diminished site risk.

ROWD Commitment:

- Develop a more detailed prioritization process to improve standardized reporting and to support re-direction of inspection resources to significant sources of priority constituents of concern

Inspection: The Permittees generally conduct two types of inspections: compliance inspections and follow-up inspections. Should an inspected site demonstrate non-compliance, inspection frequency must be increased as specified in the Permits until compliance is achieved. Although these inspections are generally viewed as beneficial, there is a regulatory agency perception (highlighted in meetings with Regional Board staff) that the inspections may be missing key items of concern and discouraging findings of non-compliance which add to the inspection burden by requiring additional follow-up activity.

SECTION 9.0, EXISTING DEVELOPMENT

Headline Indicator - Number of BMPs Implemented (Industrial Facilities): For 2004-05, 2,706 industrial facilities were reported to have BMP implementation, 68% of which have full BMP implementation; for 2003-04, 4,029 industrial facilities were reported to have BMP implementation, 59% of which have full BMP implementation; and for 2002-03, 1,026 industrial facilities were reported to have BMP implementation, 53% of which have full BMP implementation (Table 9.6; Figure 9.3).

- ☒ Level 1: Implement Program
- ☒ Level 3: Behavior Change

Headline Indicator - Number of BMPs Implemented (Commercial Facilities): For 2004-05, 5,566 commercial facilities were reported to have BMP implementation, 59% of which have full BMP implementation; for 2003-04, 8,484 commercial facilities were reported to have BMP implementation, 77% of which have full BMP implementation; and for 2002-03, 1,389 commercial facilities were reported to have BMP implementation, 63% of which have full BMP implementation (Table 9.7; Figure 9.4).

- ☒ Level 1: Implement Program
- ☒ Level 3: Behavior Change

It is also proving difficult for the inspectors to categorize BMP implementation at commercial and industrial sites along a three-point scale (fully, partially, or not implemented) because such a scale requires overly subjective determinations. Lastly, the requirement for follow-up inspections of all non-compliant sites every month is perceived to be excessive due to the already large number of sites in many cities' inventories.

ROWD Commitment:

- Develop effective alternative to re-inspection such as self-certification.

SECTION 9.0, EXISTING DEVELOPMENT

Headline Indicator - Food Facility Inspections: For the 2004-05 reporting period, 25,078 food facility inspections were conducted and 1,416 were reported to have NPDES issues (**Table 9.3**). For the 2003-04 reporting period, 12,635 food facility inspections were conducted and 1,298 were reported to have NPDES issues in the six month period of program implementation.

☒ Level 1: Implement Program

☒ Level 3: Behavior Change

The 2003-04 comparison suggests that food facility inspections and the associated education and outreach efforts are having a positive impact since the incidence of NPDES issues decreases from 1 in 10 inspections to 1 in 17 inspections .

Enforcement: Permittees are required to use a progressive enforcement approach and initiate enforcement actions where commercial and industrial facilities are found to be out of compliance. In general, specific facilities that are repeat offenders are identified through active database inventories and, in most cases, progressive enforcement is used to bring repeat offenders into compliance.

Headline Indicator - Number and Level of Enforcement Actions (Industrial Facilities): The Permittees reported a total of 371 enforcement actions against industrial facilities during the 2004-05 reporting period, 3,146 during the 2003-04 reporting period, and 533 during the 2002-03 reporting period (**Table 9.8**). The 2004-05 figure represents an 89% decrease from the total reported in 2003-04.

☒ Level 1: Implement Program

☒ Level 3: Behavior Change

Headline Indicator - Number and Level of Enforcement Actions (Commercial Facilities): The Permittees reported a total of 1,192 enforcement actions against commercial facilities during the 2004-05 reporting period, 1,534 during the 2003-04 reporting period, and 490 during the 2002-03 reporting period (**Table 9.9**). The 2004-05 figure represents a 22% decrease from the total reported in 2003-04.

☒ Level 1: Implement Program

☒ Level 3: Behavior Change

SECTION 9.0, EXISTING DEVELOPMENT

The 2003-04 comparison suggests some inconsistent reporting (e.g. Newport Beach, which compiled enforcement activity data in 2004-05 Unified Report, Section 2.10.0). However, the consistent pattern of reduced enforcement activity in the most recent reporting period across the Construction, Existing Development, and Illegal Discharges/Illicit Connections areas of the Program also suggests an increased level of compliance, also viewed as behavior change, by the regulated community.

Training: The Permits require that staff is adequately trained. In response, the Permittees developed several training modules, which are provided annually throughout the year. The training that has taken place has been deemed helpful. However, the training modules need to be updated frequently enough to keep pace with the developments in the field of stormwater management, maintain staff interest, and to provide inspectors with a technical understanding of a broad array of BMPs that can be shared with facility owner/operators.

ROWD Commitment:

- Prepare defined expertise and competencies for authorized inspector positions and develop a training schedule to meet these requirements

9.3.2 Model Residential Program

The Residential Model Program was developed to fulfill the residential activity and related commitments and requirements of Section F.3.d of the SDR Permit. The Common Interest Areas/Homeowners Associations (CIA/HOA) Activities Program was developed to fulfill the existing CIA/HOA activity commitments and requirements of Section F.6 of the SDR Permit.

Identification and Inventory: The SDR Permittees are required to identify high priority areas and activities as defined in the Permit. CIAs are considered to include high-priority areas and activities.

BMP Implementation: The SDR Permittees are required to identify minimum BMPs for high-priority areas and activities and, as necessary, additional controls. Some Permittees use a baseline BMP implementation approach for Residential areas and CIAs/HOAs unless inspectors notice a specific concern.

Enforcement and Reporting: SDR Permittees are required to enforce their stormwater ordinances for all residential areas and activities as necessary to maintain Permit compliance. The primary issue with residential areas and CIAs/HOAs concerns over irrigation. Enforcement actions taken against CIAs/HOAs include letters or notices, which generally leads to resolution of the issues. Some Permittees have reported some limited success using self certifications as a tool for effective implementation of the program within residential and CIA/HOA areas.

SECTION 9.0, EXISTING DEVELOPMENT

9.4 Summary

The Third Term Permits have required the Permittees to develop and implement a formal inspection program commencing with an initial inventory of potentially 30,000 facilities being subject to municipal oversight for stormwater and urban runoff issues. Over the first three years of this effort, there has been a clear trend in the level of inspection and enforcement activity that, despite some uncertainties with respect to reporting, suggests increased BMP implementation and compliance with local water quality ordinances by the existing industrial and commercial sector in Orange County. Based upon perceived positive outcomes of the Existing Development elements of the DAMP, the Permittees are proposing minor program modifications based upon the need for the continued training of inspectors and the sensitizing of the prioritization and inspection process toward a more effective risk-based approach.

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.1: Countywide Permittees' Industrial Inventory and Prioritization, Comparison of 2002-03, 2003-04 and 2004-05

PERMITTEE	HIGH 2002-03	HIGH 2003-04	HIGH 2004-05	MEDIUM 2002-03	MEDIUM 2003-04	MEDIUM 2004-05	LOW 2002-03	LOW 2003-04	LOW 2004-05	TOTAL 2002-03	TOTAL 2003-04	TOTAL 2004-05
Aliso Viejo	2	2	2	65	65	42	0	0	0	67	67	44
Anaheim	129	115	93	419	45	0	868	1,126	299	1,416	1,286	392
Brea	11	14	13	32	28	27	167	137	111	210	179	151
Buena Park	24	184	115	52	18	17	0	17	27	76	219	159
Costa Mesa	489	287	13	329	475	2	0	40	128	818	802	143
Cypress	2	4	0	5	2	0	34	38	0	41	44	0
Dana Point	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Fountain Valley	4	44	4	0	0	48	32	0	0	36	44	52
Fullerton	36	38	37	23	23	0	554	344	0	613	405	37
Garden Grove	25	41	30	35	51	11	310	296	25	370	388	66
Huntington Beach	30	25	30	38	69	13	645	529	23	713	623	66
Irvine	236	3	95	98	21	0	841	520	0	1,175	544	95
La Habra	NA	65	65	NA	249	48	NA	228	59	NA	542	172
La Palma	8	5	5	2	3	5	9	11	0	19	19	10
Laguna Beach	0	0	0	28	23		35	14		63	37	0
Laguna Hills	NA	1	0	NA	0	0	NA	0	0	NA	1	0
Laguna Niguel	2	1	0	0	0	0	0	0	0	2	1	0
Laguna Woods	0	0	0	0	0	0	0	0	0	0	0	0
Lake Forest	11	11	12	0	0		0	0		11	11	12
Los Alamitos	6	7	1	71	19	27	24	96	23	101	122	51
Mission Viejo	5	4	4	30	31		56	56		91	91	4
Newport Beach	2	2	2	0	0	0	11	11	11	13	13	13
Orange	69	52	72	422	416	228	256	249	0	747	717	300
Placentia	21	16	12	18	0		6	109	40	45	125	52
R S Margarita	1	1	3	10	10	10	19	19	19	30	30	32
San Clemente	2	3	2	72	72		0	0		74	75	2
S J Capistrano	1	1	1	11	5	5	15	8	4	27	14	10
Santa Ana	102	100	82	1,266	1,031	615	0	574	5	1,368	1,705	702
Seal Beach	2	2	2	0	0	0	0	0	0	2	2	2
Stanton	NA	18	18	NA	17	15	NA	118	0	NA	153	33
Tustin	9	11	13	59	6	7	0	49	55	68	66	75
Villa Park	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Westminster	10	4	4	37	18	18	34	6	6	81	28	28
Yorba Linda	29	4	7	214	206	88	0	13	2	243	223	97
County of Orange	13	16	12	13	12	9	0	0	0	26	28	21
TOTALS	1,281	1,081	749	3,349	2,915	1,235	3,916	4,608	837	8,546	8,604	2,821

NA = Not Available

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.2: Countywide Permittees' Commercial Inventory and Prioritization, Comparison of 2002-03, 2003-04 and 2004-05

PERMITTEE	HIGH 2002-03	HIGH 2003-04	HIGH 2004-05	MEDIUM 2002-03	MEDIUM 2003-04	MEDIUM 2004-05	LOW 2002-03	LOW 2003-04	LOW 2004-05	TOTAL 2002-03	TOTAL 2003-04	TOTAL 2004-05
Aliso Viejo	153	153	110	0	0		0	0		153	153	110
Anaheim	114	14	13	278	310	310	194	307	307	586	631	630
Brea	0	0	0	138	117	129	0	180	228	138	297	357
Buena Park	0	119	283	5	40	20	0	50	26	5	209	329
Costa Mesa	1,306	1,107	969	587	555	483	4,559	2,548	2,083	6,452	4,210	3,535
Cypress	0	56	2	38	162	19	39	6	203	77	224	224
Dana Point	238	205	228	0	0		0	0		238	205	228
Fountain Valley	0	112	40	0	0	77	314	139	139	314	251	256
Fullerton	7	7	126	23	23	164	639	631	116	669	661	406
Garden Grove	0	7	47	102	90	204	5,797	5,807	5,587	5,899	5,904	5,838
Huntington Beach	403	261	276	7	170	206	233	920	831	643	1,351	1,313
Irvine	0	0		105	103	148	1,040	1,038	1,132	1,145	1,141	1,280
La Habra	NA	378	414	NA	340	306	NA	177	254	NA	895	974
La Palma	0	0		17	18	12	25	30	31	42	48	43
Laguna Beach	336	356		0	2		0	7		336	365	0
Laguna Hills	NA	237	325	NA	0		NA	0		NA	237	325
Laguna Niguel	182	183	177	0	0		0	0		182	183	177
Laguna Woods	28	24	24	3	3	3	65	83	89	96	110	116
Lake Forest	10	124	150	17	68		50	182		77	374	150
Los Alamitos	NA	98		173	32		800	0		973	130	0
Mission Viejo	426	423	484	0	0		0	0		426	423	484
Newport Beach	41	41	41	40	40	40	40	40	42	121	121	123
Orange	269	0		241	311	311	54	700	725	564	1,011	1,036
Placentia	127	375		44	0		310	0	373	481	375	373
R S Margarita	126	146	141	13	0	0	377	0	438	516	146	579
San Clemente	463	688	626	0	0		0	0		463	688	626
S J Capistrano	248	316	216	0	0	277	0	0	1,401	248	316	1,894
Santa Ana	0	0		779	26	26	1	917	923	780	943	949
Seal Beach	NA	0	23	NA	183	2	NA	0	859	NA	183	884
Stanton	NA	31	31	NA	168	168	NA	476	476	NA	675	675
Tustin	1	0	1	103	104	39	0	0	40	104	104	80
Villa Park	0	0	0	0	1	1	0	6	6	0	7	7
Westminster	354	140	213	95	365	443	278	354	428	727	859	1,084
Yorba Linda	20	25	42	171	162	126	0	6	5	191	193	173
County of Orange	97	107	106	46	48	47	0	0	0	143	155	153
TOTALS	4,949	5,733	5,108	3,025	3,441	3,561	14,815	14,604	16,742	22,789	23,778	25,411

NA = Not Available

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.3: Food Facility Inspections 2003-04 and 2004-05

PERMITTEE	2003-04		2004-05	
	No. of Routine Inspections	No. of NPDES Issues	No. of Routine Inspections	No. of NPDES Issues
Aliso Viejo	116	50	218	37
Anaheim	1721	40	3,285	22
Brea	256	19	506	23
Buena Park	301	91	686	12
Costa Mesa	724	98	1,412	74
Cypress	175	12	421	0
Dana Point	186	9	374	12
Fountain Valley	313	72	545	22
Fullerton	539	46	1,054	123
Garden Grove	738	2	1,412	280
Huntington Beach	691	64	1,420	17
Irvine	718	169	1,388	52
La Habra	273	11	548	40
La Palma	42	18	118	1
Laguna Beach	203	7	382	31
Laguna Hills	149	91	332	72
Laguna Niguel	193	21	406	16
Laguna Woods	24	18	59	13
Lake Forest	307	8	547	27
Los Alamitos	98	12	193	8
Mission Viejo	325	51	591	40
Newport Beach	501	33	1,037	20
Orange	725	25	1,451	61
Placentia	185	8	386	18
Rancho Santa Margarita	95	0	179	23
San Clemente	284	5	529	7
San Juan Capistrano	1261	111	302	17
Santa Ana	141	28	2,436	145
Seal Beach	122	13	217	3
Stanton	168	20	504	1
Tustin	377	12	648	60
Villa Park	18	1	26	1
Westminster	418	123	931	96
Yorba Linda	139	4	328	23
County of Orange	109	6	207	19
Totals	12635	1298	25,078	1,416

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.4: Current and Potential Outcome Levels (Industrial/Commercial)

Industrial/Commercial Program Component	Effectiveness Assessment Outcome Levels					
	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6
	Implement Program	Increase Awareness	Behavior Change	Load Reduction	Runoff Quality	Receiving Water Quality
Inventory	✓ Maintain inventory					
Prioritization	✓ Assign priorities		✓ Change in prioritization level			
Inspection	✓ Conduct and Track number of inspections		✓ # BMPs implement	^P Load reduction associated with BMPs		
Enforcement/ Reporting	✓ Conduct enforcement		✓ Extent and correction of problem level of enforcement			
Training	✓ Track number/type of training sessions	^P Surveys show improved knowledge				
Key: ✓ = Currently Achieved Outcome Level ^P = Potentially Achievable Outcome Level						

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.5: Current and Potential Outcome Levels (Residential)

Residential & CIA/HOA Program Component	Effectiveness Assessment Outcome Levels					
	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6
	Implement Program	Increase Awareness	Behavior Change	Load Reduction	Runoff Quality	Receiving Water Quality
Identification/Inventory	✓ Maintain inventory					
BMP Implementation	✓ Conduct Inspections	✓ BMP Implementation	✓ Track number of BMPs implemented	^P Load reduction associated with BMPs		
Enforcement/ Reporting	✓ Issue EAs	✓ Track number of EAs issued & response	^P Correction of problem			
<u>Key:</u> ✓ = Currently Achieved Outcome Level ^P = Potentially Achievable Outcome Level						

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.6: Industrial Inventory and BMP Implementation, Comparison of 2002-03, 2003-04 and 2004-05

PERMITTEE	NUMBER OF FACILITIES WITH BMPs:												
	FULLY	FULLY	FULLY	PARTIALLY	PARTIALLY	PARTIALLY	NO BMPs	NO BMPs	NO BMPs	Modify/Upgrade or Implement BMP's 2002-03 ^a	TOTAL	TOTAL	TOTAL
	Implemented	Implemented	Implemented	Implemented	Implemented	Implemented	Implemented	Implemented	Implemented		2002-03	2003-04	2004-05
	2002-03	2003-04	2004-05	2002-03	2003-04	2004-05	2002-03	2003-04	2004-05				
Aliso Viejo	2	49	31	1	15	11	0	0		1	4	64	42
Anaheim	0	160	312	0	82	80	0	0		0	0	242	392
Brea	NA	NA	15	NA	NA		NA	NA	10	NA	NA	NA	25
Buena Park	NA	188	151	NA	33	102	NA	0	29	NA	NA	221	282
Costa Mesa	142	530	115	0	168	28	0	0		193	335	698	143
Cypress	NA	0	NA	NA	4	NA	NA	0	NA	NA	0	4	NA
Dana Point	NA	0	NA	NA	0	NA	NA	0	NA	NA	NA	0	NA
Fountain Valley	10	36	52	5	8		5	0		5	25	44	52
Fullerton	36	38	34	NA	23	2	NA	344		NA	36	405	36
Garden Grove	NA	55	28	NA	43	38	NA	3	1	NA	NA	101	67
Huntington Bch	3	52	14	4	19	20	17	28	33	4	28	99	67
Irvine	136	132	37	31	467	58	12	68		26	205	667	95
La Habra	NA	8	49	NA	57	108	NA	28	15	NA	NA	93	172
La Palma	0	NA	1	0	NA	6	0	NA	1	0	0	NA	8
Laguna Beach	NA	21		NA	16		NA	0		NA	NA	37	0
Laguna Hills	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	NA	0
Laguna Niguel	3	0		0	0		0	0		0	3	0	0
Laguna Woods	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	0	NA
Lake Forest	0	0	12	11	11		0	0		0	11	11	12
Los Alamitos	NA	8		NA	0		NA	0		NA	0	8	0
Mission Viejo	24	0	2	43	4	2	13	0		56	136	4	4
Newport Beach	4	1	1	0	1	2	0	0		0	4	2	3
Orange	NA	64	142	NA	2	149	NA	0	9	NA	NA	66	300
Placentia	16	0	3	14	19	7	12	2	1	14	56	21	11
R S Margarita	0	0	2	0	0	2	0	0	28	0	0	0	32
San Clemente	NA	NA	2	NA	NA	0	NA	NA	0	NA	NA	NA	2
S J Capistrano	1	10	8	2	4	2	0	0	0	1	4	14	10
Santa Ana	NA	818	639	NA	132	63	NA	0		NA	NA	950	702
Seal Beach	NA	0	1	NA	2	1	NA	0	0	NA	NA	2	2
Stanton	NA	28	28	NA	4	58	NA	1	1	NA	NA	33	87
Tustin	NA	17	17	NA	49		NA	0		NA	NA	66	17
Villa Park	0	0	0	1	0	0	0	0	0	0	1	0	0
Westminster	1	24	25	0	3	3	0	1		0	1	28	28
Yorba Linda	166	130	94	0	0	3	1	0		1	168	130	97
County of Orange	NA	19	16	NA	0	2	NA	0	0	NA	0	19	18
TOTALS	544	2,388	1,831	112	1,166	747	60	475	128	301	1,017	4,029	2,706

NA = Not Available

^a Modifications/Upgrades only applicable to 2002-03 reporting year.

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.7: Commercial Inventory and BMP Implementation, Comparison of 2002-03, 2003-04 and 2004-05

PERMITTEE	Number of Facilities with BMPs:									TOTAL 2002-03	TOTAL 2003-04	TOTAL 2004-05
	FULLY Implemented 2002-03	FULLY Implemented 2003-04	FULLY Implemented 2004-05	PARTIALLY Implemented 2002-03	PARTIALLY Implemented 2003-04	PARTIALLY Implemented 2004-05	NO BMPs Implemented 2002-03	NO BMPs Implemented 2003-04	NO BMPs Implemented 2004-05			
Aliso Viejo	69	35	35	4	64	75	8	4		81	103	110
Anaheim	0	35	46	0	2	27	0	0		0	37	73
Brea	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Buena Park	0	183	98	5	29	60	0	0	43	5	212	201
Costa Mesa	623	3,298	64	0	665	2	0	0		623	3,963	66
Cypress	NA	0		NA	2	2	NA	0		0	2	2
Dana Point	NA	NA	25	NA	NA	145	NA	NA	11	NA	NA	181
Fountain Valley	0	251	225	0	0		0	0		0	251	225
Fullerton	NA	0		NA	0		NA	0		NA	0	0
Garden Grove	NA	66	824	NA	29	455	NA	3	4	NA	98	1,283
Huntington Bch	9	59	26	2	108	21	11	120	34	22	287	81
Irvine	NA	DNR		NA	DNR		NA	DNR		NA	DNR	0
La Habra	NA	28	85	NA	107	111	NA	36	77	NA	171	273
La Palma	0	24	22	0	18	13	0	0		0	42	35
Laguna Beach	NA	NA		NA	NA		NA	NA		NA	NA	0
Laguna Hills	31	150	222	0	0		3	10	5	34	160	227
Laguna Niguel	0	123	27	0	15	18	0	0		0	138	45
Laguna Woods	NA	0		NA	27	28	NA	0		0	27	28
Lake Forest	0	0		77	48	19	0	0		77	48	19
Los Alamitos	NA	86		NA	12		NA	0		0	98	0
Mission Viejo	68	164	268	314	51	29	57	0		439	215	297
Newport Beach	NA	NA	6	NA	NA	6	NA	NA		NA	NA	12
Orange	NA	207	0	NA	0	0	NA	0	0	NA	207	0
Placentia	NA	0	32	9	63	32	NA	0		9	63	64
R S Margarita	0	0	64	0	0	21	0	0	482	0	0	567
San Clemente	NA	139	NA	NA	12	NA	NA	0	NA	NA	151	NA
Santa Ana	NA	818	304	NA	132	109	NA	0		NA	950	413
S J Capistrano	75	139	132	7	12	0	15	0	0	97	151	132
Seal Beach	NA	0	0	NA	122	0	NA	0	0	NA	122	0
Stanton	NA	35	35	NA	10	10	NA	3	10	NA	48	55
Tustin	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA
Villa Park	0	0	0	0	0	0	0	0	0	0	0	0
Westminster	0	633	675	0	219	409	0	7		0	859	1,084
Yorba Linda	NA	10	27	NA	27	7	NA	0		NA	37	34
County of Orange	2	41	49	NA	3	10	NA	NA	0	2	44	59
TOTALS	877	6,524	3,291	418	1,777	1,609	94	183	666	1,389	8,484	5,566

NA = Not Available

DNR = Did Not Report

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.8: Permittee Enforcement Actions for Industrial Facilities, Comparison of 2002-03, 2003-04 and 2004-05

PERMITTEE	EL 2002-03	EL 2003-04	EL 2004-05	NON 2002-03	NON 2003-04	NON 2004-05	ACO 2002-03	ACO 2003-04	ACO 2004-05	CDO 2002-03	CDO 2003-04	CDO 2004-05	M/I 2002-03	M/I 2003-04	M/I 2004-05	TOTAL 2002-03	TOTAL 2003-04	TOTAL 2004-05
Aliso Viejo	0	2	3	0	1	17	0	0	8	0	0	0	0	0	0	0	3	28
Anaheim	NA	0	0	NA	2	0	NA	1	0	NA	0	0	NA	0	0	NA	3	0
Brea	2	0	13	0	0	1	0	0	0	0	0	0	0	0	0	2	0	14
Buena Park	NA	0	2	NA	39	6	NA	5	13	NA	1	4	NA	0	1	NA	45	26
Costa Mesa	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Cypress	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2	0
Dana Point	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Fountain Valley	5	393	52	0	8	0	0	12	1	0	6	1	0	0	0	5	419	54
Fullerton	36	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	36	0	NA
Garden Grove	2	5	2	0	0	0	0	0	0	0	0	0	0	0	0	2	5	2
Huntington Beach	6	0	0	0	0	5	0	15	0	0	0	0	0	0	1	6	15	6
Irvine	NA	939	95	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	939	95
La Habra	NA	0	0	NA	0	28	NA	0	0	NA	0	0	NA	0	0	NA	0	28
La Palma	0	19	10	0	0	0	0	0	0	0	0	1	0	0	0	0	19	11
Laguna Beach	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Laguna Hills	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0
Laguna Niguel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Laguna Woods	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA
Lake Forest	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0
Los Alamitos	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Mission Viejo^	NA	0	0	NA	103	0	NA	0	0	NA	0	0	NA	0	0	NA	103	0
Newport Beach	6	8	2	250	618	0	200	315	0	0	0	0	0	550	0	456	1491	2
Orange	NA	66	0	NA	4	1	NA	0	0	NA	0	0	NA	0	0	NA	70	1
Placentia	7	7	10	0	0	0	0	0	0	0	0	0	0	0	0	7	7	10
R S Margarita	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
San Clemente	NA	7	0	NA	2	0	NA	2	0	NA	0	0	NA	0	0	NA	11	0
S J Capistrano	1	14	10	1	0	2	0	0	0	0	0	0	0	0	0	2	14	12
Santa Ana	NA	0	1	NA	0	2	NA	0	0	NA	0	0	NA	0	0	NA	0	3
Seal Beach	NA	NA	5	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	5
Stanton	DNR	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0
Tustin	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Villa Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Westminster	0	0	9	5	0	4	0	0	0	0	0	0	0	0	0	5	5	13
Yorba Linda	0	0	59	1	0	0	0	0	0	0	0	0	0	0	0	1	0	59
County of Orange	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
TOTALS	76	1,460	275	257	779	66	200	350	22	0	7	6	0	550	2	533	3,151	371

NA = Not Available

EL = Educational Letter

ACO = Administrative Compliance Order M/I = Misdemeanor/Infraction

DNR = Did Not Report

NON = Notice of Non-Compliance

CDO = Cease and Desist Order

^ Enforcement actions against industrial facilities are included with commercial facilities.

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.9: Permittee Enforcement Actions for Commercial Facilities, Comparison of 2002-03, 2003-04, and 2004-05

PERMITTEE	EL 2002-03	EL 2003-04	EL 2004-05	NON 2002-03	NON 2003-04	NON 2004-05	ACO 2002-03	ACO 2003-04	ACO 2004-05	CDO 2002-03	CDO 2003-04	CDO 2004-05	M/I 2002-03	M/I 2003-04	M/I 2004-05	TOTAL 2002-03	TOTAL 2003-04	TOTAL 2004-05
Aliso Viejo	70	3	4	0	0	4	2	13	2	0	0	2	0	0	1	72	16	13
Anaheim	NA	0		NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Brea	NA	4	3	NA	1		NA	0		NA	0		NA	0		NA	5	3
Buena Park	5	0		0	87	16	0	19	33	0	4	16	0	0	4	5	110	69
Costa Mesa	2	10	6	3	3	67	0	10		0	0		0	0		5	23	73
Cypress	2	0		4	2		0	0		0	0		0	0		6	2	0
Dana Point	13	14	57	41	19	3	1	0	1	0	0		1	0	1	56	33	62
Fountain Valley	6	251	256	6	2	4	21	3	7	5	1	2	0	0		38	257	269
Fullerton	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA
Garden Grove	5	37	5	2	8	1	0	0		0	0		0	0		7	45	6
Huntington Beach	16	0		3	10	13	0	80		1	0		0	0	5	20	90	18
Irvine	NA	NA		NA	NA		NA	NA		NA	NA		NA	NA		NA	NA	0
La Habra	NA	0		NA	0	25	NA	0	1	NA	0		NA	0		NA	0	26
La Palma	0	0	15	0	0		0	0		0	0		0	0		0	0	15
Laguna Beach	NA	0		NA	0		NA	0	2	NA	0		NA	0		NA	0	2
Laguna Hills	NA	11	6	NA	9	4	NA	1		NA	0		NA	0		NA	20	10
Laguna Niguel	0	127		1	15	32	0	0		0	0		0	0		1	142	32
Laguna Woods	3	0	15	4	0	18	1	0	10	0	0		0	0		8	0	43
Lake Forest	77	1		1	14	12	0	0		0	0	1	0	0		78	15	13
Los Alamitos	NA	0		NA	0		NA	0		NA	0		NA	0		NA	0	0
Mission Viejo	118	0	2	20	103	16	0	0	17	1	0	0	0	0	2	139	103	37
Newport Beach	NA	NA	2	NA	NA		NA	NA		NA	NA		NA	NA		NA	NA	2
Orange	NA	269	0	NA	13	0	NA	0	0	NA	0	0	NA	0	0	NA	283	0
Placentia	10	30	64	0	0	13	1	0	1	2	0	1	0	0	1	13	30	80
R S Margarita	10	0	32	0	0	7	0	0		0	0		0	0		10	0	39
San Clemente	NA	187	91	NA	82	63	NA	15		NA	2		NA	7	24	NA	293	178
S J Capistrano	25	10	150	7	2	5	0	0	0	0	0	0	0	0	0	32	12	155
Santa Ana	NA	0	1	NA	3	18	NA	0	1	NA	0		NA	0		NA	3	20
Seal Beach	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Stanton	DNR	DNR		DNR	DNR		DNR	DNR		DNR	DNR		DNR	DNR		NA	DNR	0
Tustin	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Villa Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Westminster	0	0	2	0	2	3	0	0		0	0		0	0		0	2	5
Yorba Linda	0	45	19	0	1	0	0	0	0	0	0	0	0	0	0	0	46	19
County of Orange	NA	0	0	NA	4	3	NA	0	0	NA	0	0	NA	0	0	NA	4	3
TOTALS	362	999	730	92	380	327	26	141	75	9	7	22	1	7	38	490	1,534	1,192

NA = Not Available

EL = Educational Letter

ACO = Administrative Compliance Order

M/I = Misdemeanor/Infraction

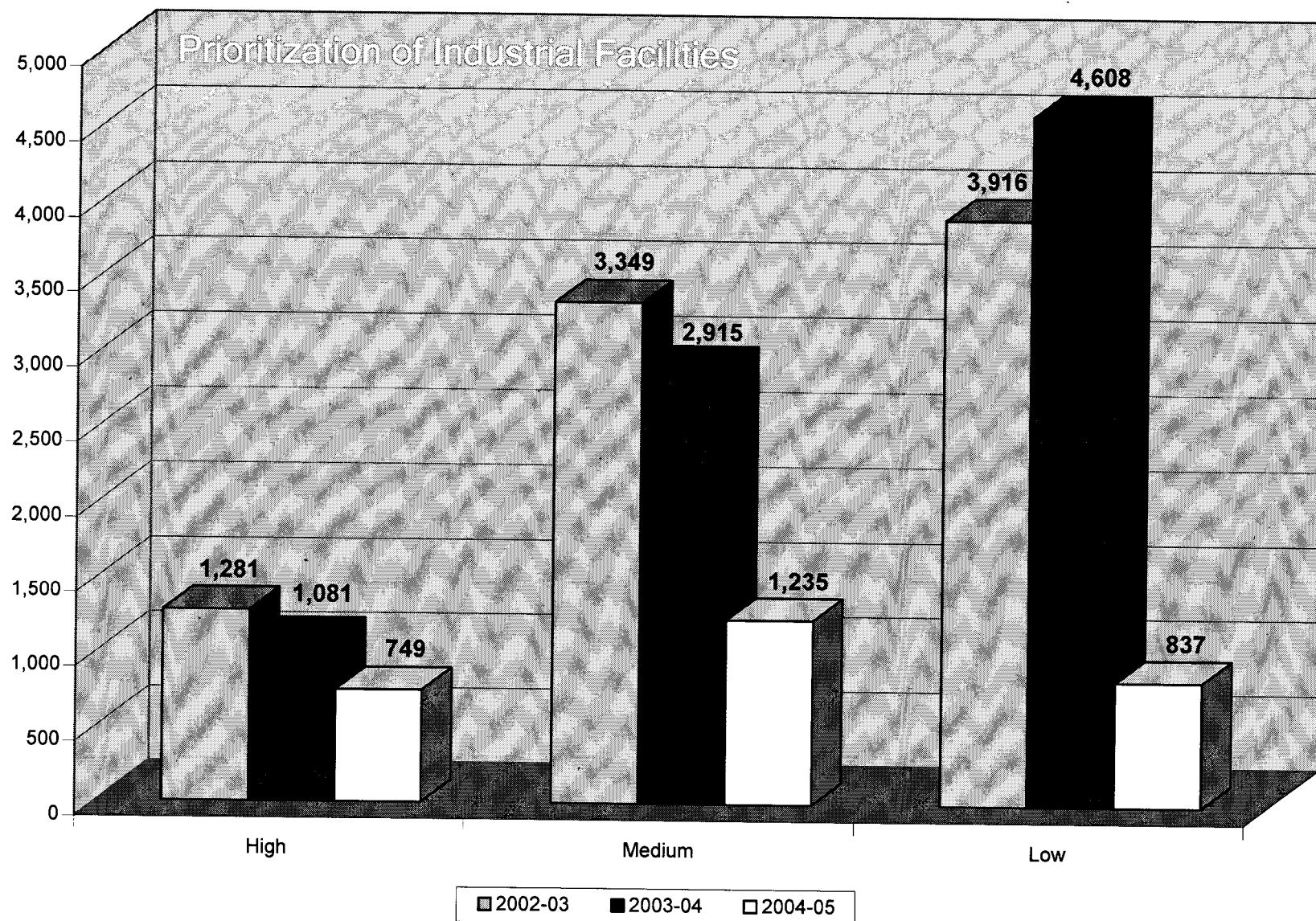
DNR = Did Not Report

NON = Notice of Non-Compliance

CDO = Cease and Desist Order

SECTION 9.0, EXISTING DEVELOPMENT

Figure 9.1: Countywide Permittees' Industrial Inventory and Prioritization, Comparison of 2002-03, 2003-04 and 2004-05



SECTION 9.0, EXISTING DEVELOPMENT

Figure 9.2: Countywide Permittees' Commercial Inventory and Prioritization, Comparison of 2002-03, 2003-04 and 2004-05

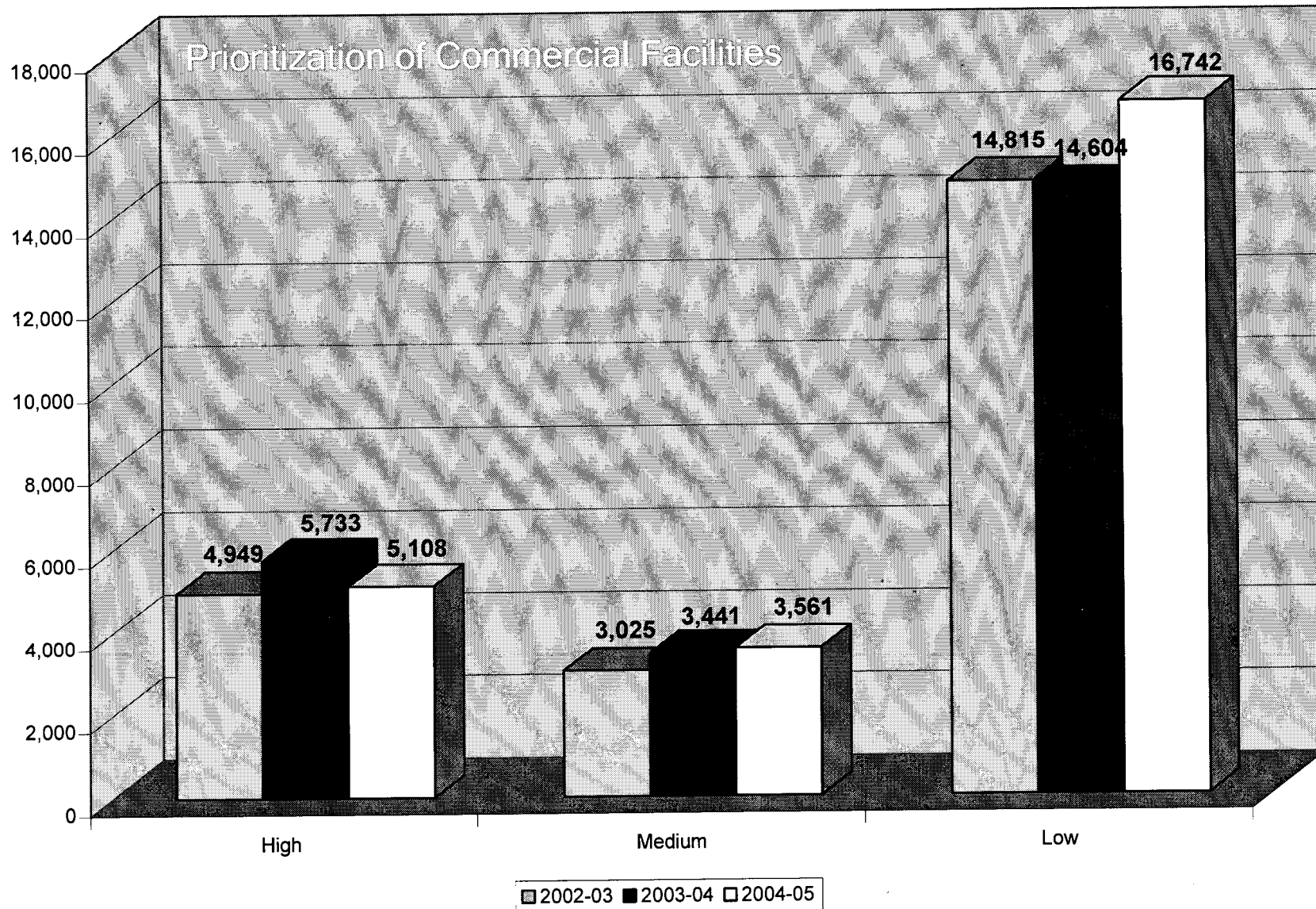
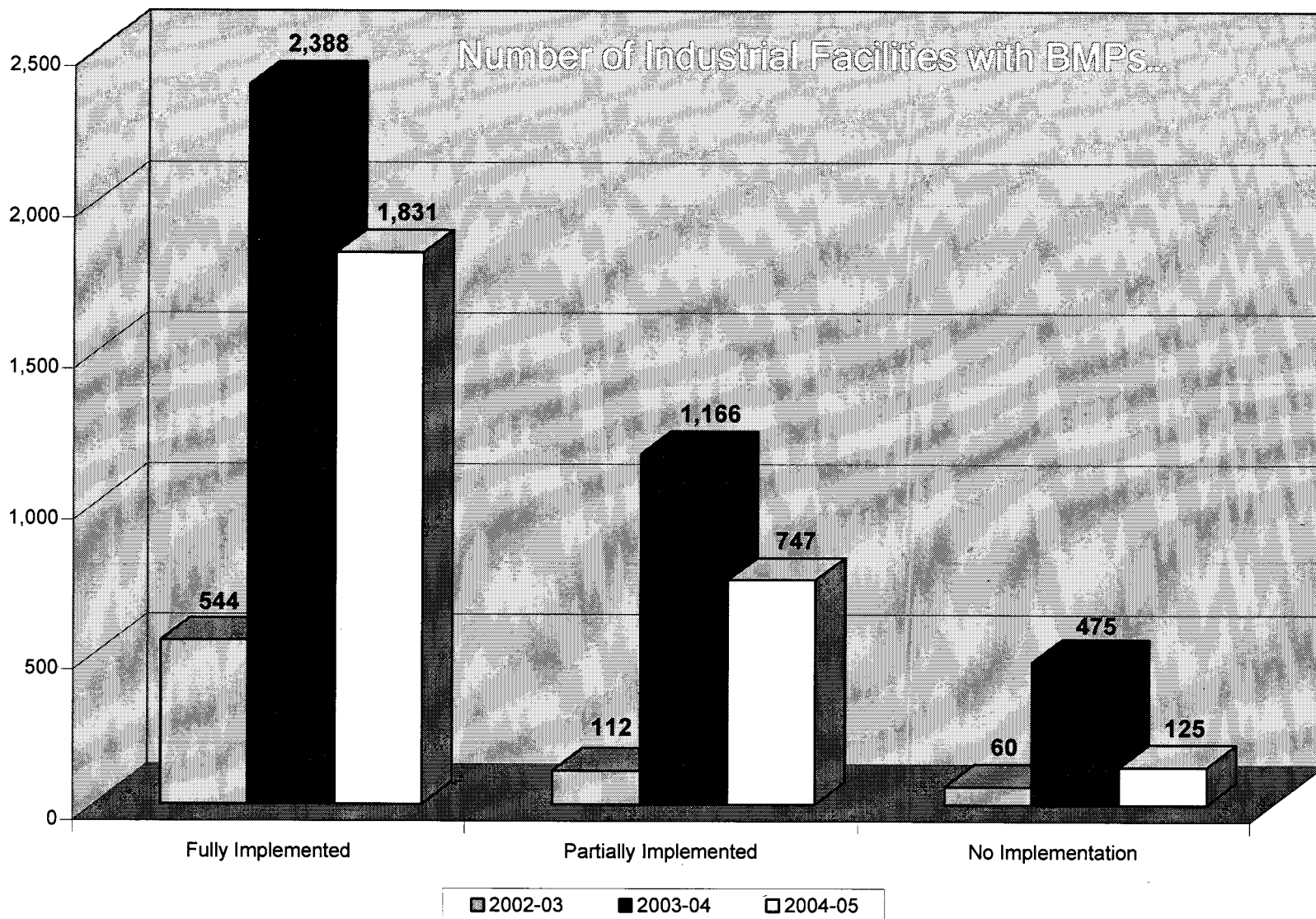
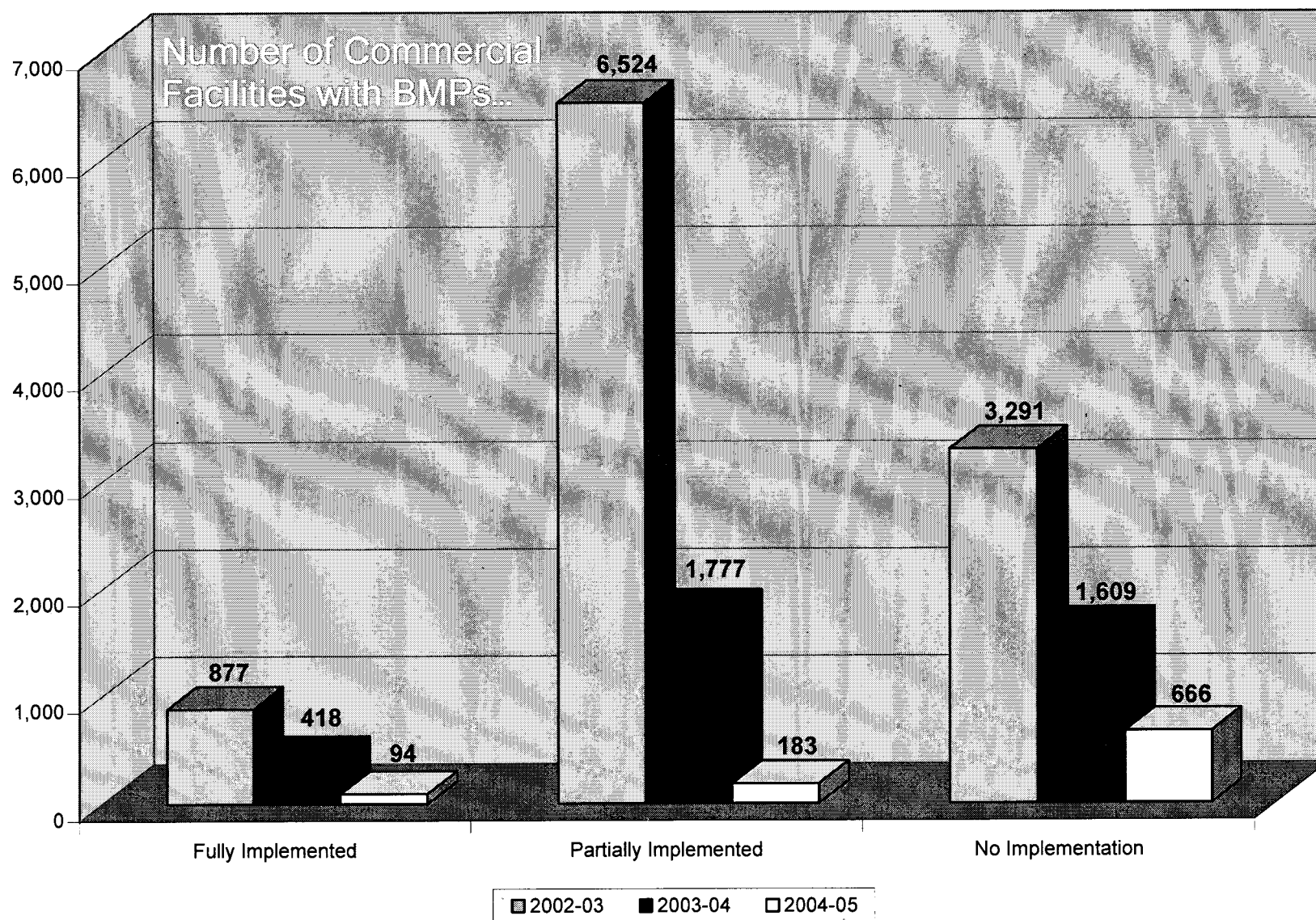


Figure 9.3: Industrial Inventory and BMP Implementation, Comparison of 2002-03, 2003-04 and 2004-05



SECTION 9.0, EXISTING DEVELOPMENT

Figure 9.4: Commercial Inventory and BMP Implementation, Comparison of 2002-03, 2003-04 and 2004-05



4 Industrial/Commercial Facilities Programs

4.1 OVERVIEW

The purpose of the Industrial/Commercial Facilities Program Element is to effectively prohibit unauthorized non-stormwater discharges and reduce pollutants in stormwater runoff from industrial and commercial facilities to the maximum extent practicable (MEP).

The daily activities of many businesses create a potential for pollutants to enter a storm drain system through both intentional and unintentional actions. The Permittees have developed programs to address this source of pollutants through inspections of targeted businesses and by providing educational outreach and enforcement if needed. These efforts include information on the potential for illicit discharges and illegal connections from businesses, assistance in the selection and use of proper BMPs, and may result in formal enforcement action and fines if environmental rules are ignored.

The program for industrial and commercial facilities is accomplished by tracking, inspecting, and ensuring compliance at industrial and commercial facilities identified as critical sources of pollutants in stormwater. Industrial and commercial facilities are managed under a single Program Element due to the similarities among these types of facilities and the effort involved to implement the program.

The Permittees use the Business Outreach and Illicit Discharge/Illegal Connection Subcommittee meeting to coordinate and implement a comprehensive program to control pollutants in stormwater discharges to municipal systems from targeted commercial facilities. The Subcommittee is comprised of representatives of the Permittee cities and other municipal staff from various departments (e.g. Environmental Health, Environmental Services, and Wastewater Services). The subcommittee provides an opportunity for the Permittees to learn from each other's experiences and develop and share resources. Each Permittee has implemented an Industrial/Commercial Business Program using the control measures identified below.

4.2 CONTROL MEASURES

Several Control Measures and accompanying performance standards have been developed by the Permittees to ensure that the Industrial/Commercial Facilities Program requirements found in the Permit are met and provide information for optimizing the Program. At the end of this chapter these control measures are evaluated to determine the effectiveness of this program element.

The Industrial/Commercial Facilities Program Control Measures are organized to be parallel to the organization of the Permit and consist of the following:

Table 4-1 Control Measures for the Industrial/Commercial Facilities Program Element

IC	Control Measure
IC1	Facility Inventory
IC2	Inspection
IC3	Industrial/Commercial BMP Implementation
IC4	Enforcement
IC5	Training
IC6	Effectiveness Assessment

4.3 FACILITY INVENTORY – IC1

The Facility Inventory Control Measure addresses the need to develop and maintain a complete and comprehensive database of industrial and commercial facilities that are determined to be critical sources of stormwater pollution. Information for the database is primarily derived from new business licenses and sanitary sewer connection permits. Facility inspections performed by the Permittees also continues to provide the details needed for the database. Some Permittees perform surveys of the industrial zoned areas in their jurisdiction to help maintain their industrial facility inventory. This survey is usually associated with industrial waste pretreatment inspections required for agencies operating a wastewater collection system.

4.3.1 Maintain and Annually Update the Industrial and Commercial Facility Inventory

As required by the Permit the Permittees maintain an inventory of industrial and commercial facilities within their jurisdictions, including those covered under the state Industrial General Permit. This inventory identifies the type of business, the watershed it is located in, and inspections and enforcement action history.

The Permittees supplement their inventory by utilizing data from County Environmental Health to obtain current facility numbers prior to planned inspections. The Regional Water Board's website also provides useful information for all Industrial General Permit holders and is used extensively for that program. These data were first compiled during the 2009/10 reporting period and will be updated on an ongoing basis as the next round of inspections discovers new facilities, as well as companies that are no longer in operation. Some businesses, such as restaurants, have a high turnover with new ones opening each year and many permanently closing their doors. Because of the continued turnover of businesses the Industrial and Commercial inventory can never be assumed to be 100% accurate, it is a snap shot in time and will be continually updated as information becomes available. The current development of inventory for 2011/12 is summarized in the following Tables.

Performance Standard 4-1

<i>Did the Co-permittees maintain and update the Industrial and Commercial Facility Inventory</i>			
	<i>Yes</i>	<i>No</i>	<i>N/A</i>
<i>Camarillo</i>	<input checked="" type="checkbox"/>		
<i>Ventura County</i>	<input checked="" type="checkbox"/>		
<i>Fillmore</i>	<input checked="" type="checkbox"/>		
<i>Moorpark</i>	<input checked="" type="checkbox"/>		
<i>Ojai</i>	<input checked="" type="checkbox"/>		
<i>Oxnard</i>	<input checked="" type="checkbox"/>		
<i>Port Hueneme</i>	<input checked="" type="checkbox"/>		
<i>Ventura</i>	<input checked="" type="checkbox"/>		
<i>Santa Paula</i>		<input checked="" type="checkbox"/>	
<i>Simi Valley</i>	<input checked="" type="checkbox"/>		
<i>Thousand Oaks</i>	<input checked="" type="checkbox"/>		

Figure 4-1 Commercial/Industrial Facilities Inventory

Commercial / Industrial Facilities Countywide

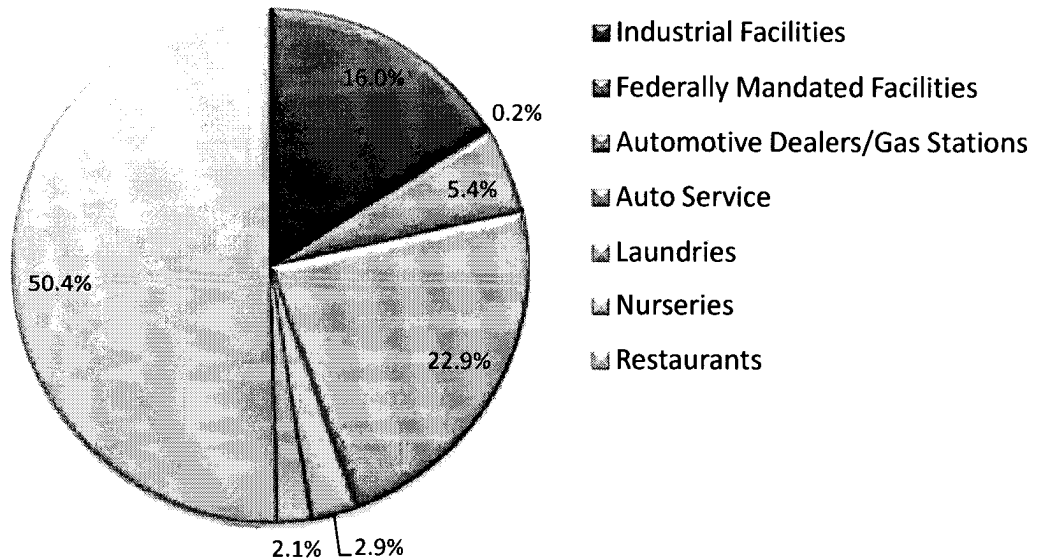


Figure 4-2 Commercial/Industrial Facilities by Permittee

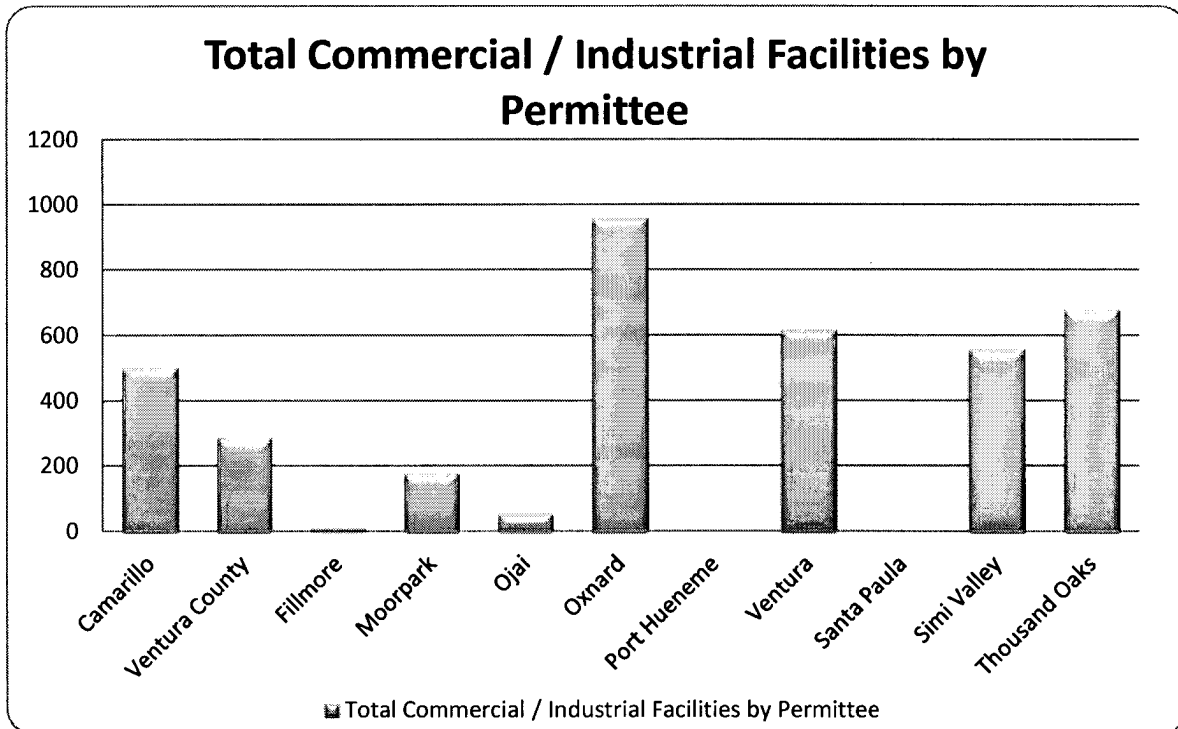
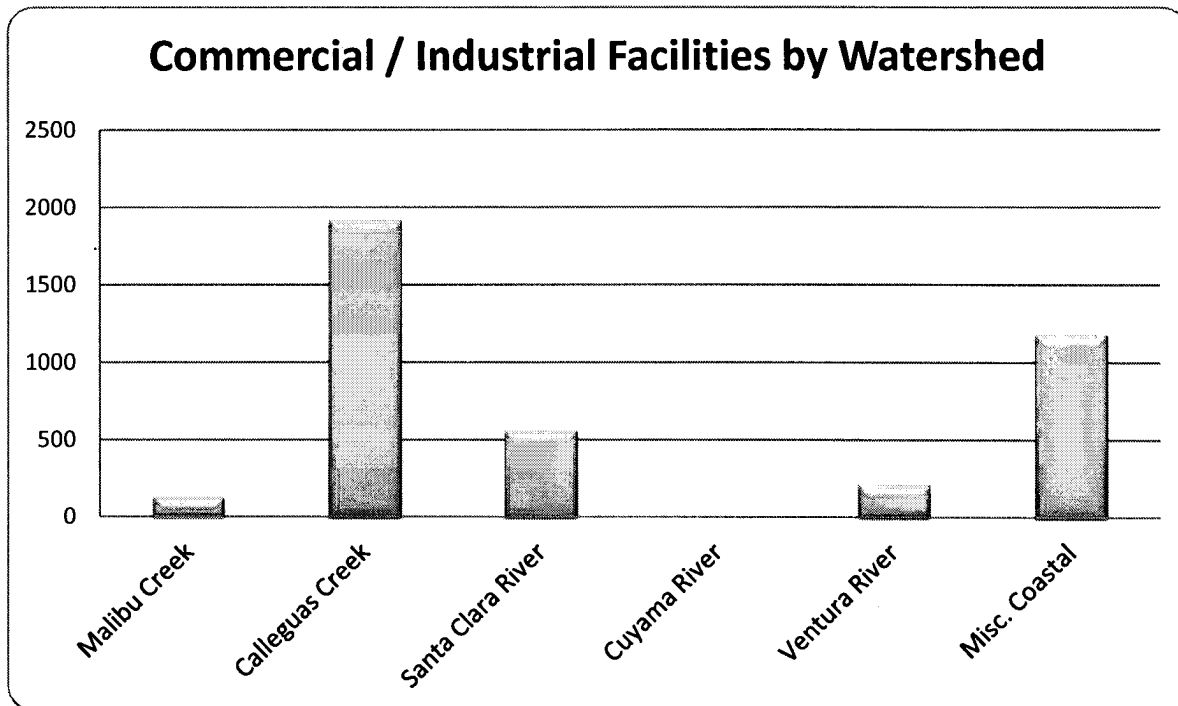


Figure 4-3 Commercial Industrial Facilities by Watershed

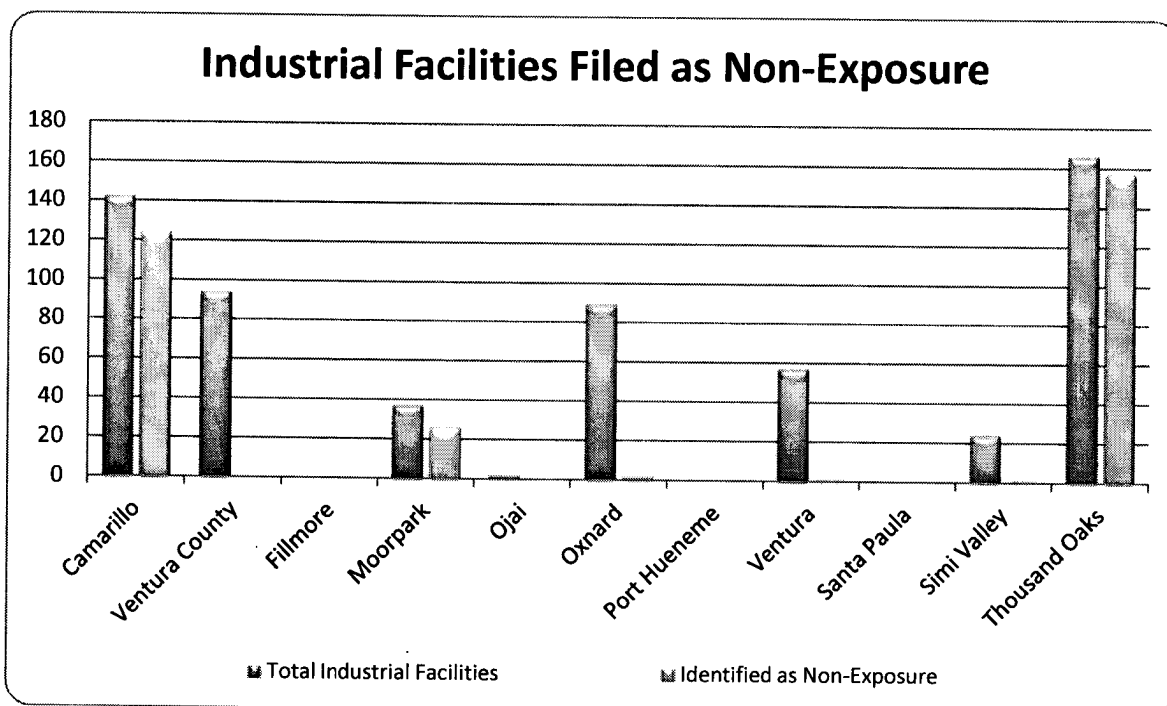


4.4 INSPECT INDUSTRIAL AND COMMERCIAL FACILITIES TWICE DURING PERMIT TERM

To satisfy the requirement of inspecting these facilities twice during the Permit term the Permittees began their inspection of industrial and commercial facilities in the 2009/10 Permit year. With respect to industrial facilities, if the initial inspection revealed no risk of exposure of industrial activities to stormwater at a facility, then that facility may be categorized as *No Exposure Status*. A second inspection is required at a rate that provides annual re-inspection of a minimum of 20% of all such facilities determined to have non-exposure.

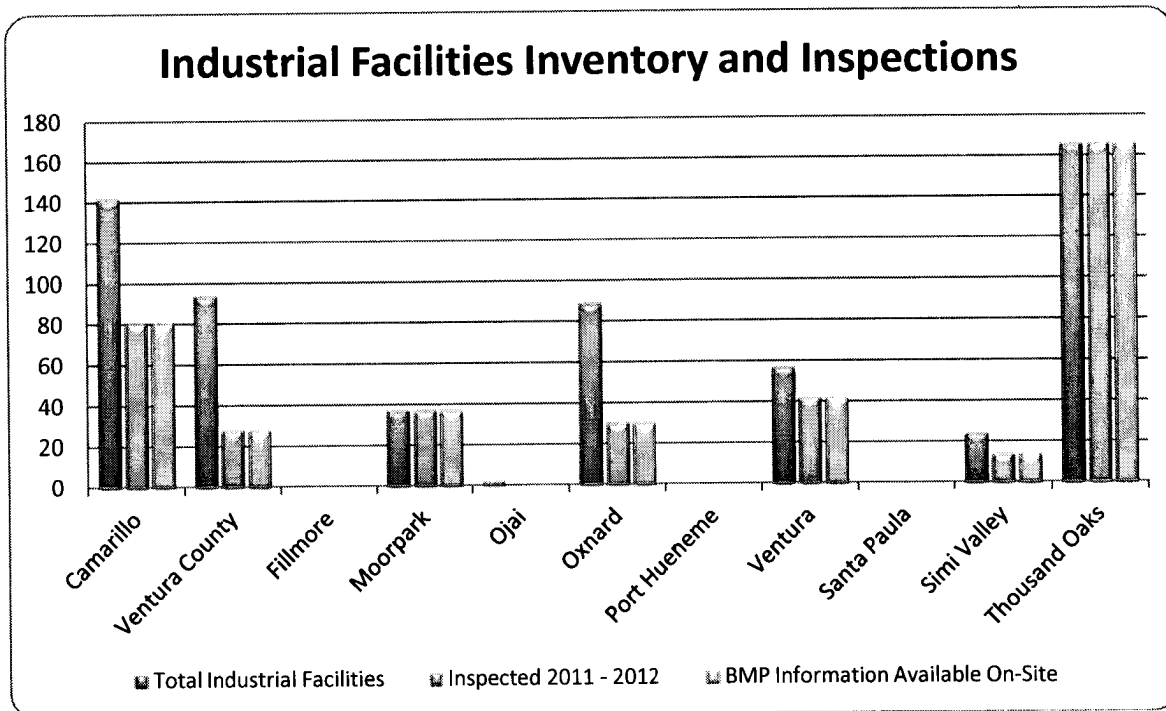
All initial industrial and commercial facility inspections must be completed no later than July 8, 2012. A minimum interval of six months between the first and second compliance inspection is required at all industrial and commercial facilities. It is possible that a site will be visited sooner than six months if requested by the Regional Board staff to assist with their investigations, or if an illicit discharge is suspected.

Figure 4-4 Industrial Facilities Filed as Non-Exposure



The permit requires the first industrial and commercial inspections be completed by July 8, 2012. The inspection programs are ongoing with continual updates to the inventory and facilities being re-inspected at least once more during the permit term. The status of the industrial commercial inspection program through the end of the reporting period is represented in the following tables.

Figure 4-5 Industrial Facilities Inventory and Inspections



Industrial Facilities includes U.S. EPA Phase I, II Facilities required to obtain coverage under the Industrial Activities Stormwater General Permit (IAGSP). These facilities are identified by either the Standard Industrial Classifications (SIC) or the North American Industry Classification System (NAICS). Facility ownership (federal, state, municipal, private) are not factors in this definition and so the inventory includes facilities such as the Naval Base Ventura County at Point Mugu.

COUNTY OF VENTURA UNINCORPORATED AREA
STORMWATER MANAGEMENT PROGRAM
Stormwater Inspection Checklist
INDUSTRIAL AND FEDERALLY REGULATED FACILITIES

INSPECTION TYPE
☐ INITIAL INSPECTION (NEW FACILITIES)
☐ FOLLOW-UP INSPECTION (FACILITIES WITH DEFECTS)
☐ 2nd FOLLOW-UP INSPECTION (FACILITIES WITH DEFECTS)

☐ 1st INSPECTION OF FACILITIES WITH EXISTING DEFECTS (FACILITIES WITH DEFECTS)
☐ 2nd INSPECTION OF FACILITIES WITH EXISTING DEFECTS (FACILITIES WITH DEFECTS)
☐ 3rd INSPECTION OF FACILITIES WITH EXISTING DEFECTS (FACILITIES WITH DEFECTS)

INSPECTOR NAME _____ **INSPECTION DATE & TIME** _____

FACILITY NAME _____

FACILITY ADDRESS _____

FACILITY CONTACT NAME _____ **PHONE** _____

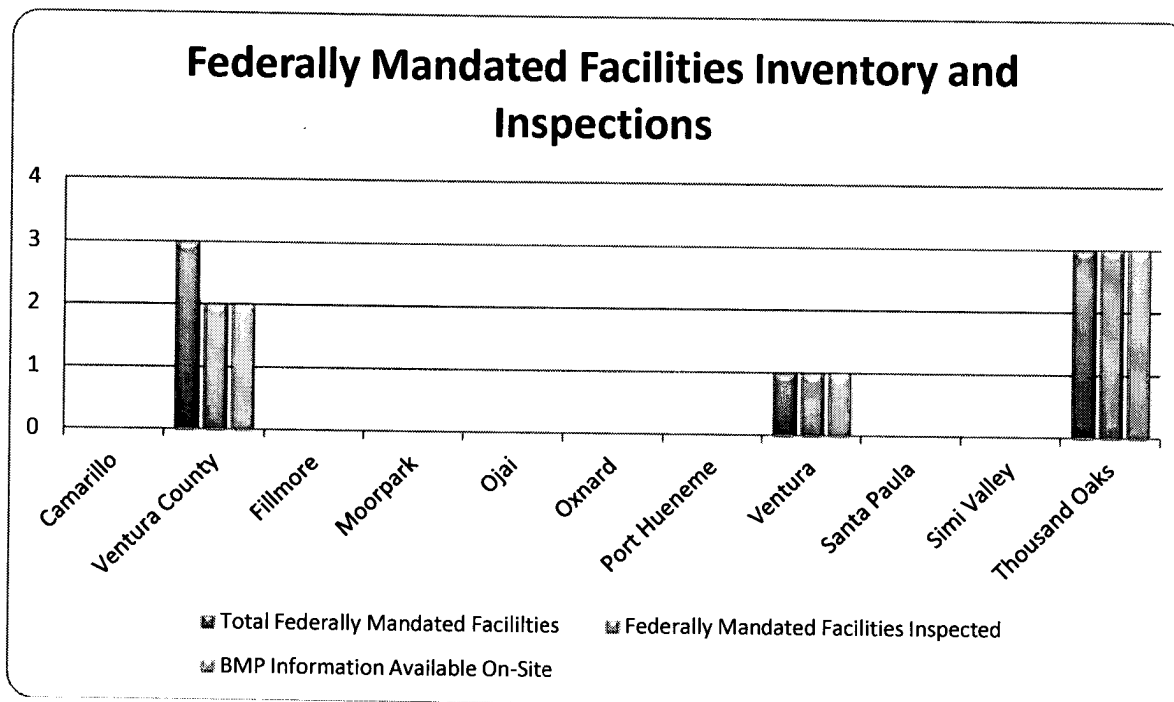
FACILITY CONTACT SIGNATURE (PRINT NAME AND TITLE) _____

FACILITY'S SIC/NAICS CODE _____

FACILITY CATEGORY _____

THIS FACILITY IS COVERED UNDER:
☐ Industrial Activities Stormwater General Permit (IAGSP) WQRP # _____
☐ NPDES permit # _____
☐ Other Permit (Specify) _____
☐ Are EPCRA 900/901/902/903/904/906/907/908/909/910/911/912/913/914/915/916/917/918/919/920/921/922/923/924/925/926/927/928/929/930/931/932/933/934/935/936/937/938/939/940/941/942/943/944/945/946/947/948/949/950/951/952/953/954/955/956/957/958/959/960/961/962/963/964/965/966/967/968/969/970/971/972/973/974/975/976/977/978/979/980/981/982/983/984/985/986/987/988/989/990/991/992/993/994/995/996/997/998/999/1000/1001/1002/1003/1004/1005/1006/1007/1008/1009/1010/1011/1012/1013/1014/1015/1016/1017/1018/1019/1020/1021/1022/1023/1024/1025/1026/1027/1028/1029/1030/1031/1032/1033/1034/1035/1036/1037/1038/1039/1040/1041/1042/1043/1044/1045/1046/1047/1048/1049/1050/1051/1052/1053/1054/1055/1056/1057/1058/1059/1060/1061/1062/1063/1064/1065/1066/1067/1068/1069/1070/1071/1072/1073/1074/1075/1076/1077/1078/1079/1080/1081/1082/1083/1084/1085/1086/1087/1088/1089/1090/1091/1092/1093/1094/1095/1096/1097/1098/1099/1100/1101/1102/1103/1104/1105/1106/1107/1108/1109/1110/1111/1112/1113/1114/1115/1116/1117/1118/1119/1120/1121/1122/1123/1124/1125/1126/1127/1128/1129/1130/1131/1132/1133/1134/1135/1136/1137/1138/1139/1140/1141/1142/1143/1144/1145/1146/1147/1148/1149/1150/1151/1152/1153/1154/1155/1156/1157/1158/1159/1160/1161/1162/1163/1164/1165/1166/1167/1168/1169/1170/1171/1172/1173/1174/1175/1176/1177/1178/1179/1180/1181/1182/1183/1184/1185/1186/1187/1188/1189/1190/1191/1192/1193/1194/1195/1196/1197/1198/1199/1200/1201/1202/1203/1204/1205/1206/1207/1208/1209/1210/1211/1212/1213/1214/1215/1216/1217/1218/1219/1220/1221/1222/1223/1224/1225/1226/1227/1228/1229/1230/1231/1232/1233/1234/1235/1236/1237/1238/1239/1240/1241/1242/1243/1244/1245/1246/1247/1248/1249/1250/1251/1252/1253/1254/1255/1256/1257/1258/1259/1260/1261/1262/1263/1264/1265/1266/1267/1268/1269/1270/1271/1272/1273/1274/1275/1276/1277/1278/1279/1280/1281/1282/1283/1284/1285/1286/1287/1288/1289/1290/1291/1292/1293/1294/1295/1296/1297/1298/1299/1300/1301/1302/1303/1304/1305/1306/1307/1308/1309/1310/1311/1312/1313/1314/1315/1316/1317/1318/1319/1320/1321/1322/1323/1324/1325/1326/1327/1328/1329/1330/1331/1332/1333/1334/1335/1336/1337/1338/1339/1340/1341/1342/1343/1344/1345/1346/1347/1348/1349/1350/1351/1352/1353/1354/1355/1356/1357/1358/1359/1360/1361/1362/1363/1364/1365/1366/1367/1368/1369/1370/1371/1372/1373/1374/1375/1376/1377/1378/1379/1380/1381/1382/1383/1384/1385/1386/1387/1388/1389/1390/1391/1392/1393/1394/1395/1396/1397/1398/1399/1400/1401/1402/1403/1404/1405/1406/1407/1408/1409/1410/1411/1412/1413/1414/1415/1416/1417/1418/1419/1420/1421/1422/1423/1424/1425/1426/1427/1428/1429/1430/1431/1432/1433/1434/1435/1436/1437/1438/1439/1440/1441/1442/1443/1444/1445/1446/1447/1448/1449/1450/1451/1452/1453/1454/1455/1456/1457/1458/1459/1460/1461/1462/1463/1464/1465/1466/1467/1468/1469/1470/1471/1472/1473/1474/1475/1476/1477/1478/1479/1480/1481/1482/1483/1484/1485/1486/1487/1488/1489/1490/1491/1492/1493/1494/1495/1496/1497/1498/1499/1500/1501/1502/1503/1504/1505/1506/1507/1508/1509/1510/1511/1512/1513/1514/1515/1516/1517/1518/1519/1520/1521/1522/1523/1524/1525/1526/1527/1528/1529/1530/1531/1532/1533/1534/1535/1536/1537/1538/1539/1540/1541/1542/1543/1544/1545/1546/1547/1548/1549/1550/1551/1552/1553/1554/1555/1556/1557/1558/1559/1560/1561/1562/1563/1564/1565/1566/1567/1568/1569/1570/1571/1572/1573/1574/1575/1576/1577/1578/1579/1580/1581/1582/1583/1584/1585/1586/1587/1588/1589/1590/1591/1592/1593/1594/1595/1596/1597/1598/1599/1600/1601/1602/1603/1604/1605/1606/1607/1608/1609/1610/1611/1612/1613/1614/1615/1616/1617/1618/1619/1620/1621/1622/1623/1624/1625/1626/1627/1628/1629/1630/1631/1632/1633/1634/1635/1636/1637/1638/1639/1640/1641/1642/1643/1644/1645/1646/1647/1648/1649/1650/1651/1652/1653/1654/1655/1656/1657/1658/1659/1660/1661/1662/1663/1664/1665/1666/1667/1668/1669/1670/1671/1672/1673/1674/1675/1676/1677/1678/1679/1680/1681/1682/1683/1684/1685/1686/1687/1688/1689/1690/1691/1692/1693/1694/1695/1696/1697/1698/1699/1700/1701/1702/1703/1704/1705/1706/1707/1708/1709/1710/1711/1712/1713/1714/1715/1716/1717/1718/1719/1720/1721/1722/1723/1724/1725/1726/1727/1728/1729/1730/1731/1732/1733/1734/1735/1736/1737/1738/1739/1740/1741/1742/1743/1744/1745/1746/1747/1748/1749/1750/1751/1752/1753/1754/1755/1756/1757/1758/1759/1760/1761/1762/1763/1764/1765/1766/1767/1768/1769/1770/1771/1772/1773/1774/1775/1776/1777/1778/1779/1780/1781/1782/1783/1784/1785/1786/1787/1788/1789/1790/1791/1792/1793/1794/1795/1796/1797/1798/1799/1800/1801/1802/1803/1804/1805/1806/1807/1808/1809/1810/1811/1812/1813/1814/1815/1816/1817/1818/1819/1820/1821/1822/1823/1824/1825/1826/1827/1828/1829/1830/1831/1832/1833/1834/1835/1836/1837/1838/1839/1840/1841/1842/1843/1844/1845/1846/1847/1848/1849/1850/1851/1852/1853/1854/1855/1856/1857/1858/1859/1860/1861/1862/1863/1864/1865/1866/1867/1868/1869/1870/1871/1872/1873/1874/1875/1876/1877/1878/1879/1880/1881/1882/1883/1884/1885/1886/1887/1888/1889/1890/1891/1892/1893/1894/1895/1896/1897/1898/1899/1900/1901/1902/1903/1904/1905/1906/1907/1908/1909/1910/1911/1912/1913/1914/1915/1916/1917/1918/1919/1920/1921/1922/1923/1924/1925/1926/1927/1928/1929/1930/1931/1932/1933/1934/1935/1936/1937/1938/1939/1940/1941/1942/1943/1944/1945/1946/1947/1948/1949/1950/1951/1952/1953/1954/1955/1956/1957/1958/1959/1960/1961/1962/1963/1964/1965/1966/1967/1968/1969/1970/1971/1972/1973/1974/1975/1976/1977/1978/1979/1980/1981/1982/1983/1984/1985/1986/1987/1988/1989/1990/1991/1992/1993/1994/1995/1996/1997/1998/1999/2000/2001/2002/2003/2004/2005/2006/2007/2008/2009/2010/2011/2012/2013/2014/2015/2016/2017/2018/2019/2020/2021/2022/2023/2024/2025/2026/2027/2028/2029/2030/2031/2032/2033/2034/2035/2036/2037/2038/2039/2040/2041/2042/2043/2044/2045/2046/2047/2048/2049/2050/2051/2052/2053/2054/2055/2056/2057/2058/2059/2060/2061/2062/2063/2064/2065/2066/2067/2068/2069/2070/2071/2072/2073/2074/2075/2076/2077/2078/2079/2080/2081/2082/2083/2084/2085/2086/2087/2088/2089/2090/2091/2092/2093/2094/2095/2096/2097/2098/2099/2100/2101/2102/2103/2104/2105/2106/2107/2108/2109/2110/2111/2112/2113/2114/2115/2116/2117/2118/2119/2120/2121/2122/2123/2124/2125/2126/2127/2128/2129/2130/2131/2132/2133/2134/2135/2136/2137/2138/2139/2140/2141/2142/2143/2144/2145/2146/2147/2148/2149/2150/2151/2152/2153/2154/2155/2156/2157/2158/2159/2160/2161/2162/2163/2164/2165/2166/2167/2168/2169/2170/2171/2172/2173/2174/2175/2176/2177/2178/2179/2180/2181/2182/2183/2184/2185/2186/2187/2188/2189/2190/2191/2192/2193/2194/2195/2196/2197/2198/2199/2200/2201/2202/2203/2204/2205/2206/2207/2208/2209/2210/2211/2212/2213/2214/2215/2216/2217/2218/2219/2220/2221/2222/2223/2224/2225/2226/2227/2228/2229/2230/2231/2232/2233/2234/2235/2236/2237/2238/2239/2240/2241/2242/2243/2244/2245/2246/2247/2248/2249/2250/2251/2252/2253/2254/2255/2256/2257/2258/2259/2260/2261/2262/2263/2264/2265/2266/2267/2268/2269/2270/2271/2272/2273/2274/2275/2276/2277/2278/2279/2280/2281/2282/2283/2284/2285/2286/2287/2288/2289/2290/2291/2292/2293/2294/2295/2296/2297/2298/2299/2300/2301/2302/2303/2304/2305/2306/2307/2308/2309/2310/2311/2312/2313/2314/2315/2316/2317/2318/2319/2320/2321/2322/2323/2324/2325/2326/2327/2328/2329/2330/2331/2332/2333/2334/2335/2336/2337/2338/2339/2340/2341/2342/2343/2344/2345/2346/2347/2348/2349/2350/2351/2352/2353/2354/2355/2356/2357/2358/2359/2360/2361/2362/2363/2364/2365/2366/2367/2368/2369/2370/2371/2372/2373/2374/2375/2376/2377/2378/2379/2380/2381/2382/2383/2384/2385/2386/2387/2388/2389/2390/2391/2392/2393/2394/2395/2396/2397/2398/2399/2400/2401/2402/2403/2404/2405/2406/2407/2408/2409/2410/2411/2412/2413/2414/2415/2416/2417/2418/2419/2420/2421/2422/2423/2424/2425/2426/2427/2428/2429/2430/2431/2432/2433/2434/2435/2436/2437/2438/2439/2440/2441/2442/2443/2444/2445/2446/2447/2448/2449/2450/2451/2452/2453/2454/2455/2456/2457/2458/2459/2460/2461/2462/2463/2464/2465/2466/2467/2468/2469/2470/2471/2472/2473/2474/2475/2476/2477/2478/2479/2480/2481/2482/2483/2484/2485/2486/2487/2488/2489/2490/2491/2492/2493/2494/2495/2496/2497/2498/2499/2500/2501/2502/2503/2504/2505/2506/2507/2508/2509/2510/2511/2512/2513/2514/2515/2516/2517/2518/2519/2520/2521/2522/2523/2524/2525/2526/2527/2528/2529/2530/2531/2532/2533/2534/2535/2536/2537/2538/2539/2540/2541/2542/2543/2544/2545/2546/2547/2548/2549/2550/2551/2552/2553/2554/2555/2556/2557/2558/2559/2560/2561/2562/2563/2564/2565/2566/2567/2568/2569/2570/2571/2572/2573/2574/2575/2576/2577/2578/2579/2580/2581/2582/2583/2584/2585/2586/2587/2588/2589/2590/2591/2592/2593/2594/2595/2596/2597/2598/2599/2600/2601/2602/2603/2604/2605/2606/2607/2608/2609/2610/2611/2612/2613/2614/2615/2616/2617/2618/2619/2620/2621/2622/2623/2624/2625/2626/2627/2628/2629/2630/2631/2632/2633/2634/2635/2636/2637/2638/2639/2640/2641/2642/2643/2644/2645/2646/2647/2648/2649/2650/2651/2652/2653/2654/2655/2656/2657/2658/2659/2660/2661/2662/2663/2664/2665/2666/2667/2668/2669/2670/2671/2672/2673/2674/2675/2676/2677/2678/2679/2680/2681/2682/2683/2684/2685/2686/2687/2688/2689/2690/2691/2692/2693/2694/2695/2696/2697/2698/2699/2700/2701/2702/2703/2704/2705/2706/2707/2708/2709/2710/2711/2712/2713/2714/2715/2716/2717/2718/2719/2720/2721/2722/2723/2724/2725/2726/2727/2728/2729/2730/2731/2732/2733/2734/2735/2736/2737/2738/2739/2740/2741/2742/2743/2744/2745/2746/2747/2748/2749/2750/2751/2752/2753/2754/2755/2756/2757/2758/2759/2760/2761/2762/2763/2764/2765/2766/2767/2768/2769/2770/2771/2772/2773/2774/2775/2776/2777/2778/2779/2780/2781/2782/2783/2784/2785/2786/2787/2788/2789/2790/2791/2792/2793/2794/2795/2796/2797/2798/2799/2800/2801/2802/2803/2804/2805/2806/2807/2808/2809/2810/2811/2812/2813/2814/2815/2816/2817/2818/2819/2820/2821/2822/2823/2824/2825/2826/2827/2828/2829/2830/2831/2832/2833/2834/2835/2836/2837/2838/2839/2840/2841/2842/2843/2844/2845/2846/2847/2848/2849/2850/2851/2852/2853/2854/2855/2856/2857/2858/2859/2860/2861/2862/2863/2864/2865/2866/2867/2868/2869/2870/2871/2872/2873/2874/2875/2876/2877/2878/2879/2880/2881/2882/2883/2884/2885/2886/2887/2888/2889/2890/2891/2892/2893/2894/2895/2896/2897/2898/2899/2900/2901/2902/2903/2904/2905/2906/2907/2908/2909/2910/2911/2912/2913/2914/2915/2916/2917/2918/2919/2920/2921/2922/2923/2924/2925/2926/2927/2928/2929/2930/2931/2932/2933/2934/2935/2936/2937/2938/2939/2940/2941/2942/2943/2944/2945/2946/2947/2948/2949/2950/2951/2952/2953/2954/2955/2956/2957/2958/2959/2960/2961/2962/2963/2964/2965/2966/2967/2968/2969/2970/2971/2972/2973/2974/2975/2976/2977/2978/2979/2980/2981/2982/2983/2984/2985/2986/2987/2988/2989/2990/2991/2992/2993/2994/2995/2996/2997/2998/2999/3000/3001/3002/3003/3004/3005/3006/3007/3008/3009/3010/3011/3012/3013/3014/3015/3016/3017/3018/3019/3020/3021/3022/3023/3024/3025/3026/3027/3028/3029/3030/3031/3032/3033/3034/3035/3036/3037/3038/3039/3040/3041/3042/3043/3044/3045/3046/3047/3048/3049/3050/3051/3052/3053/3054/3055/3056/3057/3058/3059/3060/3061/3062/3063/3064/3065/3066/3067/3068/3069/3070/3071/3072/3073/3074/3075/3076/3077/3078/3079/3080/3081/3082/30

Figure 4-6 Federally Mandated Facilities Inventory and Inspections

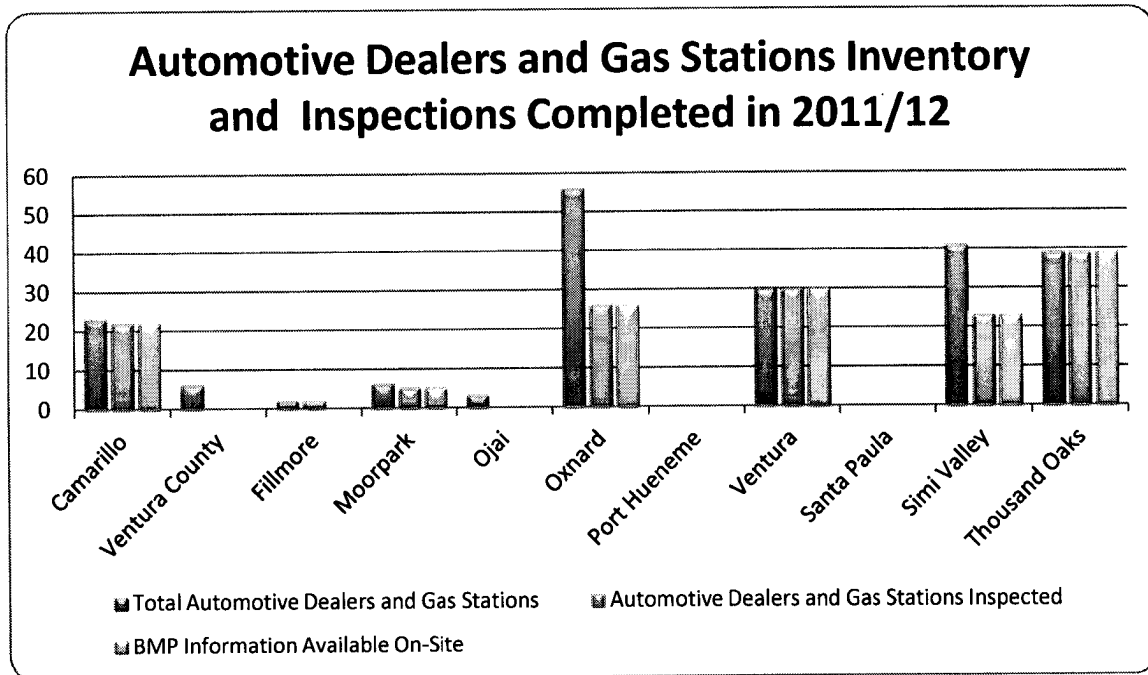


Other Federally-mandated Facilities [as specified in 40 CFR 122.26(d)(2)(iv)(C)] are also required to obtain coverage under the IAGSP. Again, facility ownership (federal, state, municipal, private) and profit motive (business or not-for-profit) of the facility are not factors in this definition. Included in this category are:

- Municipal landfills
- Hazardous waste treatment, disposal, and recovery facilities
- Facilities subject to SARA Title III (also known as the Emergency Planning and Community Right-to-Know Act (EPCRA))

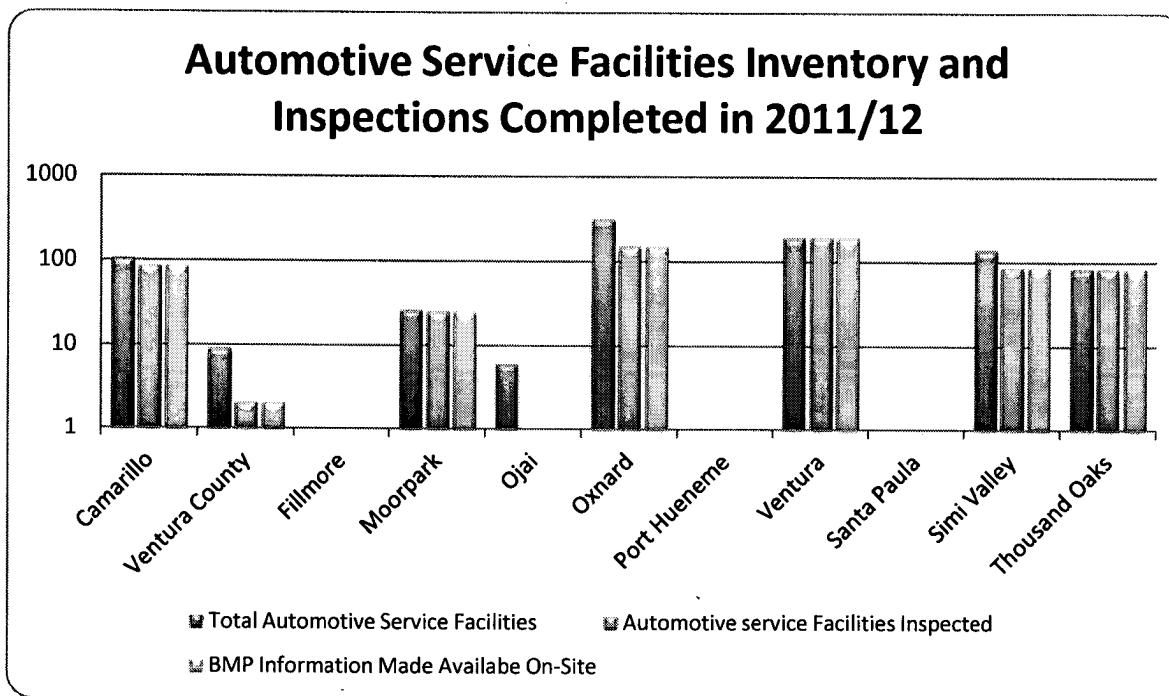
Inspections are conducted at all automotive and gas station facilities even if these facilities do not have outdoor activities or storage that are exposed to stormwater. In addition, the Permittees have identified other facilities where engine oil is present and represents a potential threat to stormwater pollution, e.g., boat dealers, RV dealers, motorcycle dealers, etc. Facilities that are only inspected if they have outdoor activities or outside storage that are exposed to stormwater are auto parts stores and tire dealers.

Figure 4-7 Automotive Dealers and Gas Stations Inventory and Inspections



An inspector reviews the findings of an inspection with the business manager

Figure 4-8 Automotive Service Facilities Inventory and Inspections



All automotive service facilities are included in the inventory for inspection, this category also includes motorcycle and boat repair if there is a potential for stormwater pollution.

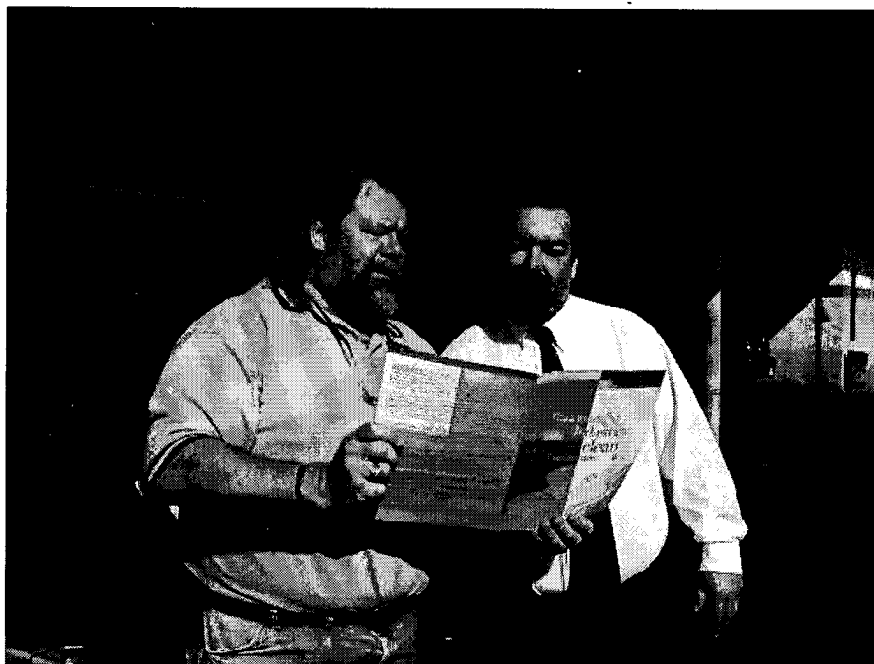
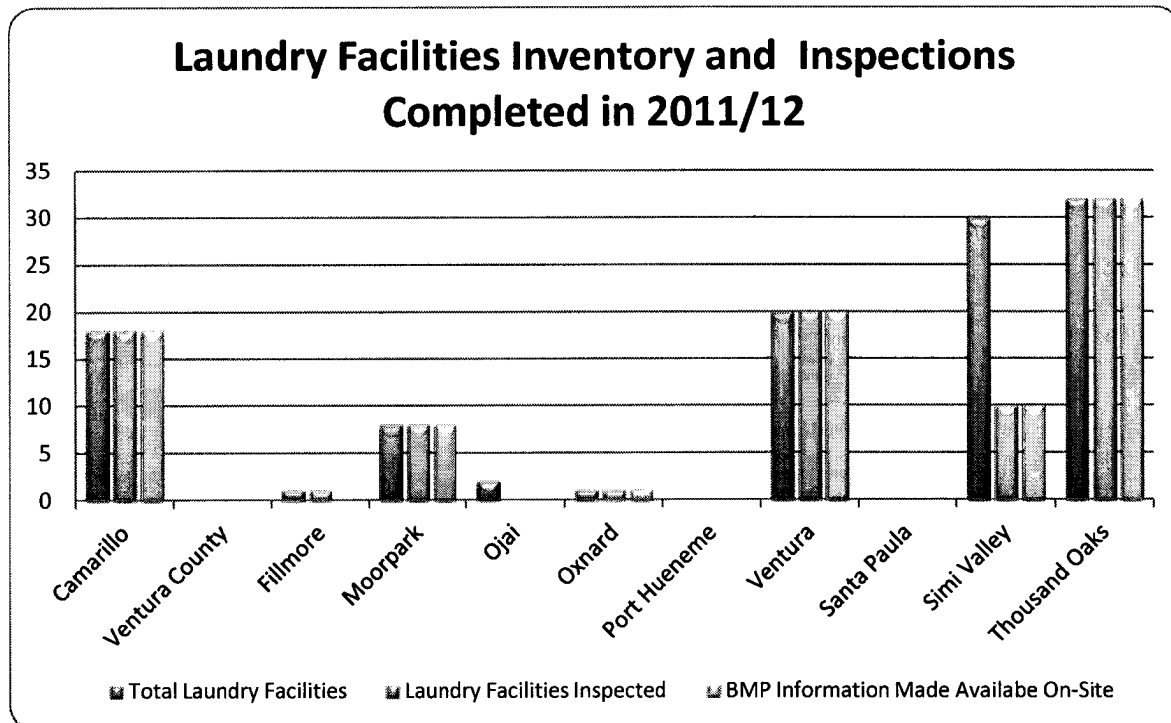


Figure 4-9 Laundry Facilities Inventory and Inspections



Permittees made an effort to identify all laundry facilities in their jurisdiction that may possibly have an exposure to stormwater and therefore a possible threat to stormwater quality. Some Permittees went as far as to include dry cleaners and laundromats. All commercial laundries in a jurisdiction were identified and screened for potential exposure. If there was no exposure potential then an inspection was deemed unnecessary.

The Permit includes requirements for the Permittees to confirm that nursery operators that are exposed to stormwater implement pollutant reduction and control measures with the objective of reducing pollutants in stormwater runoff discharges. "Nurseries" comprises establishments primarily engaged in the merchant wholesale distribution of flowers, florists' supplies, and/ or nursery stock (except plant seeds and plant bulbs). The industry in NAICS Code 444220 comprises establishments primarily engaged in retailing nursery and garden products, such as trees, shrubs, plants, seeds, bulbs, floriculture products and sod, which are predominantly grown elsewhere. These establishments may sell a limited amount of a product they grow themselves.

This is interpreted by the Permittees to not include stores that may have some plants or a small nursery section although it is not their primary business. Florist that specialize in cut flowers are also not included because their business and inventory is kept indoors. However, most Permittees have extended this to include the large home improvement centers due to the size of their nursery section.

Figure 4-10 Nursery Facilities Inventory and Inspections

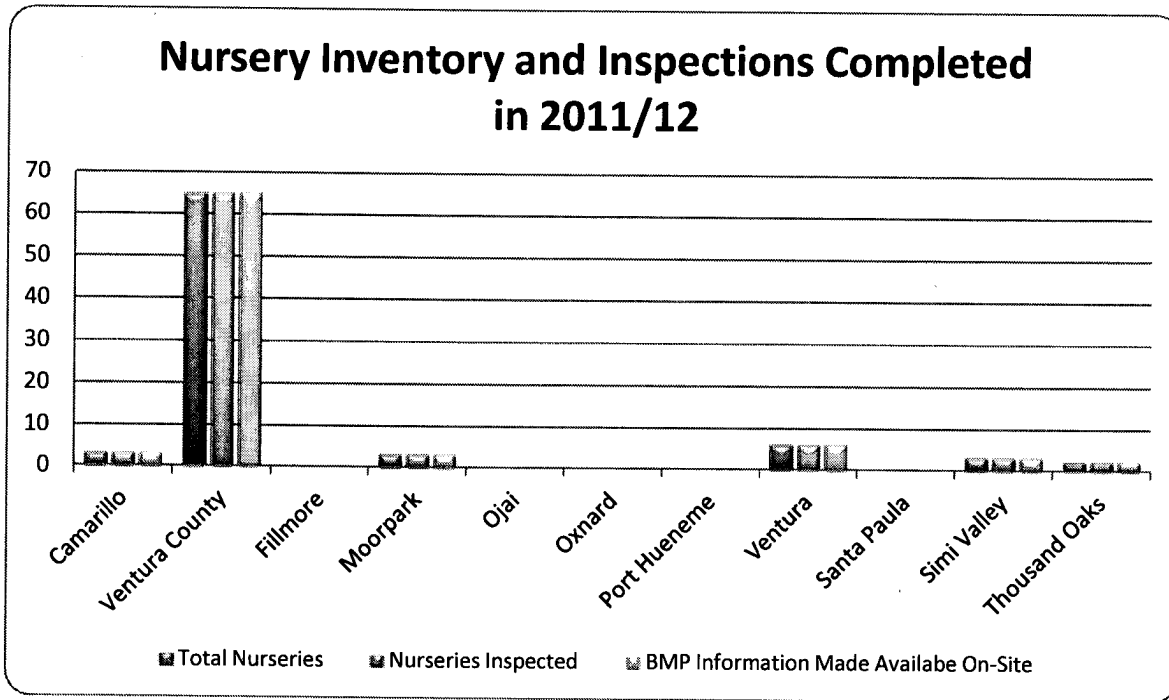
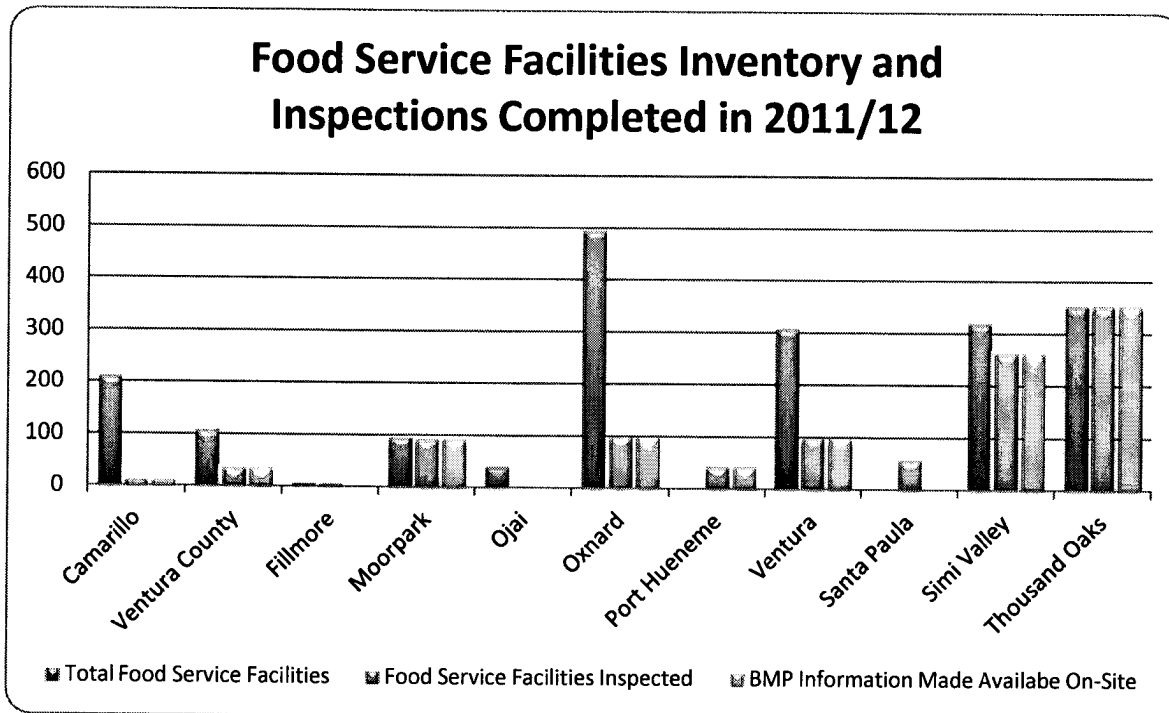


Figure 4-11 Food Service Facilities Inventory and Inspections



For the purposes of inventory and inspection the term food service facility means a facility that sells prepared foods and drinks for consumption, including stationary lunch counters and refreshment stands selling prepared foods and drinks for immediate consumption (SIC Code 5812). This will include supermarkets if they have a deli selling food which is prepared on-site, but will not include grocery stores, bakeries and candy stores not engaged in food preparation.

4.5 INSPECTION – IC2

The Inspection Control Measure establishes the inspection requirements associated with on-site visits. The inspections ensure that the facility operator is effectively implementing source control BMPs, is in compliance with municipal ordinances, has pertinent educational materials, and is not producing unauthorized non-stormwater discharges. Inspection of facilities covered under the IASGP also ensures that the operator has a current Waste Discharge Identification (WDID) number, a Stormwater Pollution Prevention Plan (SWPPP) is available on site, and the operator is effectively implementing BMPs. Stopping unauthorized discharges is the primary purpose of the inspections, however it is also just as important to educate businesses on proper disposal of wastes and other BMPs to prevent future discharges to the storm drain system. To accomplish this educational information is made available to businesses that do not immediately have it available for their staff.

4.5.1 Inspections

The Permittees' municipal ordinances currently allow authorized officers to enter any property or building to perform inspections. On refusal to allow inspection by the owner, tenant, occupant, agent or other responsible party, the Permittees may seek an Administrative Search Warrant. All the Permittees have or are reviewing their ordinances to determine if there is a need to strengthen their ability to perform inspections, as well as the enforcement tools at their disposal to bring an uncooperative business into compliance.

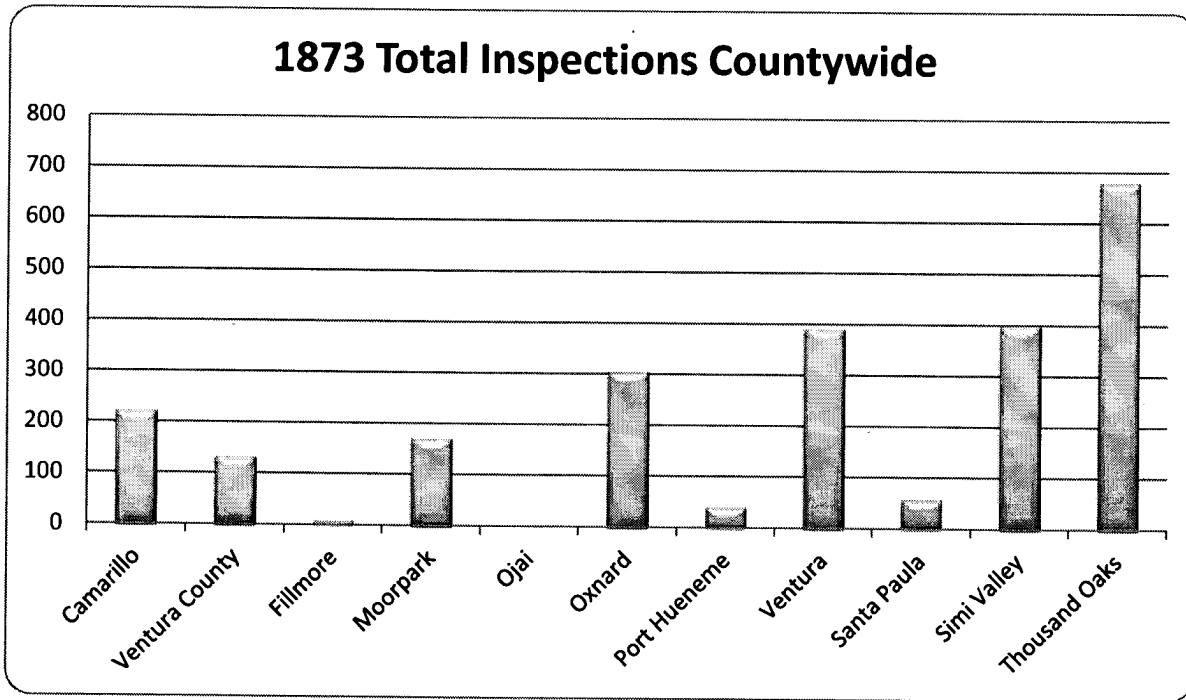
Performance Standard 4-2

<i>Begin initial inspections of commercial and industrial facilities? (inspections to be completed by July 8, 2012)</i>			
	<i>Yes</i>	<i>No</i>	<i>N/A</i>
<i>Camarillo</i>	<input checked="" type="checkbox"/>		
<i>Ventura County</i>	<input checked="" type="checkbox"/>		
<i>Fillmore</i>	<input checked="" type="checkbox"/>		
<i>Moorpark</i>	<input checked="" type="checkbox"/>		
<i>Ojai</i>	<input checked="" type="checkbox"/>		
<i>Oxnard</i>	<input checked="" type="checkbox"/>		
<i>Port Hueneme</i>		<input checked="" type="checkbox"/>	
<i>Ventura</i>	<input checked="" type="checkbox"/>		
<i>Santa Paula</i>		<input checked="" type="checkbox"/>	
<i>Simi Valley</i>	<input checked="" type="checkbox"/>		
<i>Thousand Oaks</i>	<input checked="" type="checkbox"/>		

inspection staff informed facilities' owners/managers that BMP implementation does not guarantee compliance nor relieve them from additional regulations, and that it is their continued responsibility to ensure that pollutants do not escape the facility.


The vast majority of site visits performed were unannounced providing the inspectors with an honest look at daily activities of the facility. During these site visits, Permittee inspection staff would meet with the business owner/manager to review the objectives of the inspection. After performing a walk-through of the facility, inspection results were discussed with the business owner/manager. In the event a Permittee determined a facility's stormwater BMPs were insufficient, the Permittee provided their recommendations to the facility owner/manager. Source control BMPs were recommended as a first step in BMP implementation before requiring the facility to implement costly structural BMPs. In all cases,

Figure 4-12 Total Inspections Countywide



Review/Revise the Industrial Inspection and Commercial Business-Specific Checklists as Needed

In order to ensure that the inspectors conduct thorough and consistent inspections, industrial and commercial checklists have been developed for different targeted businesses. Permittee industrial inspectors receive proper training to adequately assess facilities and offer assistance in suggesting remedies. County and municipal ordinances with support from City Attorney's and County Counsel offices also provide the proper legal backing for inspections and any necessary enforcement. Checklists are periodically updated as necessary to ensure that they provide an adequate and sufficiently comprehensive basis upon which to conduct inspections. Currently, the Program has inspection checklists for general industry, restaurants, automobile related businesses, nurseries, and laundries. Examples of the checklists are included as Attachment A.



**COUNTY OF VENTURA UNINCORPORATED AREA
STORMWATER MANAGEMENT PROGRAM**

Stormwater Inspection Checklist
Restaurants

INSPECTION TYPE:

<input type="checkbox"/> INITIAL INSPECTION (new construction)	<input type="checkbox"/> 1st Follow-up after 30-day inspection
<input type="checkbox"/> 1st Follow-up after INITIAL INSPECTION	<input type="checkbox"/> 2nd Follow-up after 30-day inspection
<input type="checkbox"/> 2nd Follow-up after INITIAL INSPECTION	<input type="checkbox"/> Completed Remediation
<input type="checkbox"/> 3rd Follow-up after INITIAL INSPECTION	

INSPECTOR NAME: _____ **INSPECTION DATE & TIME:** _____

FACILITY NAME: _____

FACILITY ADDRESS: _____

FACILITY CONTACT NAME: _____ **PHONE:** _____

FACILITY CONTACT SIGNATURE (acknowledging receipt): _____

DATE OF INSPECTION: _____ **INSPECTOR SIGNATURE:** _____

STATUS OF COMPLIANCE:

FACILITY IS LOCATED IN ONE OF THE FOLLOWING CATEGORIES:

<input type="checkbox"/> Commercial/Industrial	<input type="checkbox"/> Mobile Food	<input type="checkbox"/> Mobile Food/Service
<input type="checkbox"/> Mobile Food	<input type="checkbox"/> Temporary Food	<input type="checkbox"/> Mobile Food/Service

Item #	Description/Notes	Yes	No	N/A
SD-13	Any construction activity (new or existing) within 100 feet of the stormwater management system?			
SD-14	Any signs of leaking or dripping on stormwater management system? (e.g., roof leaks, pipe leaks, etc.)			
SD-15	Any signs of leaking or dripping on stormwater management system? (e.g., roof leaks, pipe leaks, etc.)			
SD-16	Any signs of leaking or dripping on stormwater management system? (e.g., roof leaks, pipe leaks, etc.)			
SD-17	Any signs of leaking or dripping on stormwater management system? (e.g., roof leaks, pipe leaks, etc.)			
SD-18	Any signs of leaking or dripping on stormwater management system? (e.g., roof leaks, pipe leaks, etc.)			

Restaurant Inspection Checklist

Performance Standard 4-3

<i>Review/revise the industrial inspection checklist to be consistent with the permit</i>			
	<i>Yes</i>	<i>No</i>	<i>N/A</i>
<i>Camarillo</i>	<input checked="" type="checkbox"/>		
<i>Ventura County</i>	<input checked="" type="checkbox"/>		
<i>Fillmore</i>	<input checked="" type="checkbox"/>		
<i>Moorpark</i>	<input checked="" type="checkbox"/>		
<i>Ojai</i>	<input checked="" type="checkbox"/>		
<i>Oxnard</i>	<input checked="" type="checkbox"/>		
<i>Port Hueneme</i>	<input checked="" type="checkbox"/>		
<i>Ventura</i>	<input checked="" type="checkbox"/>		
<i>Santa Paula</i>	<input checked="" type="checkbox"/>		
<i>Simi Valley</i>	<input checked="" type="checkbox"/>		
<i>Thousand Oaks</i>	<input checked="" type="checkbox"/>		

Performance Standard 4-4

<i>Review/revise the commercial business-specific checklist to be consistent with the permit</i>			
	<i>Yes</i>	<i>No</i>	<i>N/A</i>
<i>Camarillo</i>	<input checked="" type="checkbox"/>		
<i>Ventura County</i>	<input checked="" type="checkbox"/>		
<i>Fillmore</i>	<input checked="" type="checkbox"/>		
<i>Moorpark</i>	<input checked="" type="checkbox"/>		
<i>Ojai</i>	<input checked="" type="checkbox"/>		
<i>Oxnard</i>	<input checked="" type="checkbox"/>		
<i>Port Hueneme</i>	<input checked="" type="checkbox"/>		
<i>Ventura</i>	<input checked="" type="checkbox"/>		
<i>Santa Paula</i>	<input checked="" type="checkbox"/>		
<i>Simi Valley</i>	<input checked="" type="checkbox"/>		
<i>Thousand Oaks</i>	<input checked="" type="checkbox"/>		

Conduct Follow-up Inspections as Necessary

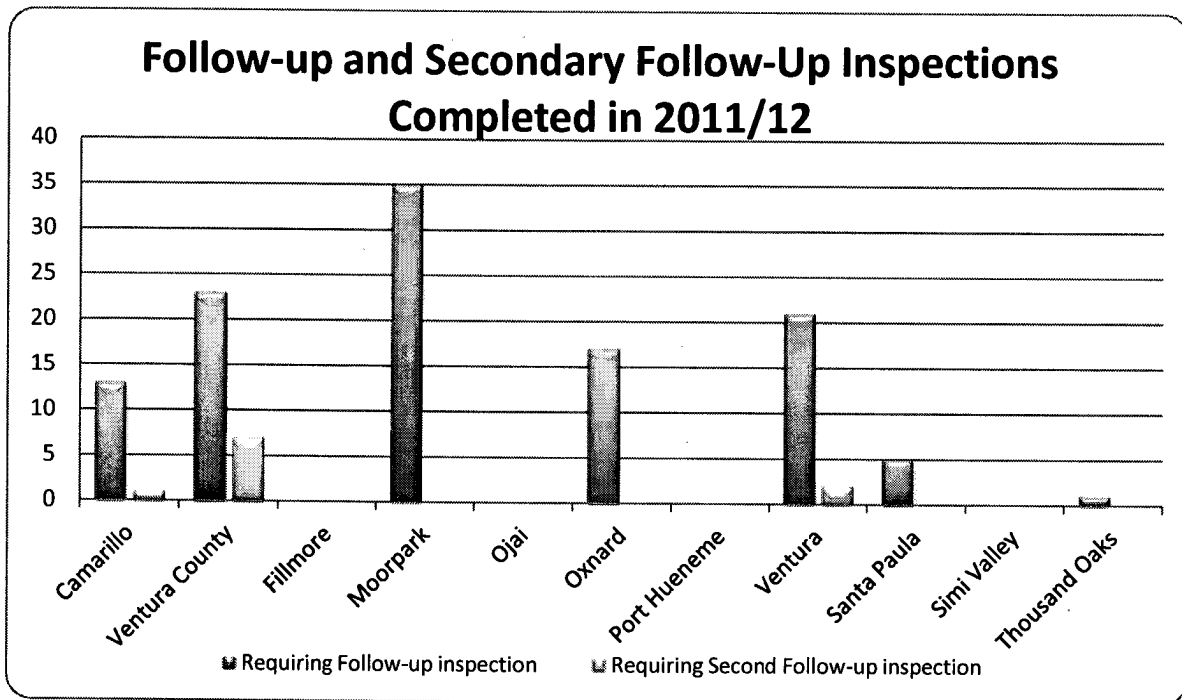
Whenever the Permittee determined that an operator had failed to adequately implement all necessary BMPs as required by the Permit, or otherwise were deemed out of compliance, the Permittee engaged in progressive enforcement action. If the facility can be brought into compliance while the inspector is still on-site a follow-up inspection is not deemed necessary. All other facilities that failed to implement all necessary BMPs were advised there would be follow-up visits. The Permit requires that re-inspection occurs within four weeks of the initial inspection. Follow-up visits may be scheduled, especially if the facility operator is difficult to get a hold of, but for the majority of businesses the follow-up inspections are unannounced surprise inspections. If continued stormwater violations were found progressive enforcement actions were initiated, and another visit was scheduled if necessary. Enforcement actions may include any of the following: Warning Notice, Notice of Violation(s), Administrative Civil Liability actions and monetary fines. These actions are described in detail and reported in Section 8 - Programs for Illicit Discharges.

Performance Standard 4-5

<i>Conduct follow-up inspections as necessary</i>			
	<i>Yes</i>	<i>No</i>	<i>N/A</i>
<i>Camarillo</i>	<input checked="" type="checkbox"/>		
<i>Ventura County</i>	<input checked="" type="checkbox"/>		
<i>Fillmore</i>	<input checked="" type="checkbox"/>		
<i>Moorpark</i>		<input checked="" type="checkbox"/>	
<i>Ojai</i>	<input checked="" type="checkbox"/>		
<i>Oxnard</i>	<input checked="" type="checkbox"/>		
<i>Port Hueneme</i>			<input checked="" type="checkbox"/>
<i>Ventura</i>	<input checked="" type="checkbox"/>		
<i>Santa Paula</i>		<input checked="" type="checkbox"/>	
<i>Simi Valley</i>	<input checked="" type="checkbox"/>		
<i>Thousand Oaks</i>	<input checked="" type="checkbox"/>		

The number of required Initial Follow-Up Inspections and Secondary Follow-Up Inspections can be seen by Permittee in Figure 4-13 Follow-up and Secondary Inspections.

Figure 4-13 Follow-up and Secondary Inspections



4.6 INDUSTRIAL/COMMERCIAL BMP IMPLEMENTATION – IC3

The Industrial/Commercial BMP Implementation Control Measure requires industrial and commercial businesses to reduce pollutants in stormwater discharges and cease any unauthorized non-stormwater discharges to the storm drain system. Although the Permittees may provide guidance to facility operators on appropriate Source and Treatment Control BMP selection and application, the selection of specific

BMPs to be implemented is the responsibility of the discharger. The Permittees develop business specific guidance (fact sheets) that is updated as necessary to reflect new requirements and/or knowledge.

4.6.1 BMP Fact Sheets and Selection

In order to assist the industrial and commercial facilities in selecting and implementing the appropriate types of BMPs, the Permittees developed BMP Fact Sheets for industrial and commercial businesses. The BMP Fact Sheets are distributed during the inspections and made available on the Ventura Countywide Stormwater Quality Management Program's website at the following address:

http://www.vcstormwater.org/programs_business.html#business_factsheets

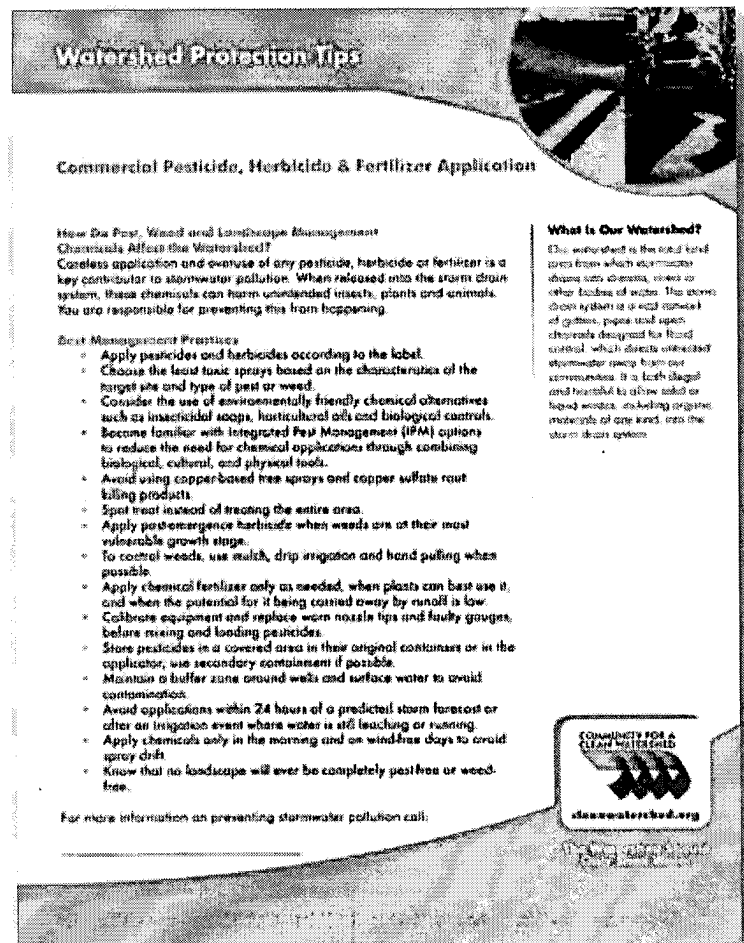
BMP fact sheets were updated and new ones created for several target audiences during this reporting period including:

- Building and Grounds Maintenance
- Pool and Spa Maintenance
- Commercial Pesticide Application
- Mobile Cleaning Services
- Mobile Auto Detailing and Charity Car Wash Events, and
- Building Repair and Remodeling.

These have been added to the library of fact sheets the Program has already developed for automotive service facilities, RGOs, and nurseries.

4.6.2 Distribute BMP Fact Sheets during Inspections

The Permittees distribute BMP Fact Sheets to facility owners/operators as a part of the inspection process. The development and distribution of these fact sheets, along with the inspection program where inspectors meet with the local facility managers about stormwater regulations and BMPs also serves to meet the Permit requirement for Corporate Outreach under the Public Information and Participation Program.



Fact Sheet for Pesticide Applicators

Performance Standard 4-6

Ensure information on BMPs was available on site			
	Yes	No	N/A
Camarillo	<input checked="" type="checkbox"/>		
Ventura County	<input checked="" type="checkbox"/>		
Fillmore	<input checked="" type="checkbox"/>		
Moorpark	<input checked="" type="checkbox"/>		
Ojai	<input checked="" type="checkbox"/>		
Oxnard	<input checked="" type="checkbox"/>		
Port Hueneme			<input checked="" type="checkbox"/>
Ventura	<input checked="" type="checkbox"/>		
Santa Paula		<input checked="" type="checkbox"/>	
Simi Valley	<input checked="" type="checkbox"/>		
Thousand Oaks	<input checked="" type="checkbox"/>		

efforts to maintain adequate legal authority for the Stormwater Program in general.

4.7.1 Implement the Progressive Enforcement and Referral Policy

The Permittees have a progressive enforcement and referral policy so that the enforcement actions match the severity of a violation and include distinct, progressive steps initiated to bring a facility into compliance. Options are available for progressive corrective actions for repeat offenders. Inspections are performed to assess compliance with municipal stormwater ordinances and any noncompliance is managed through the enforcement policy. Noncompliance may include failure to implement adequate source control or structural BMPs, or other violations of County and municipal ordinances.

The Permittees' facility inventory contains an "inspection findings" data field for comments pertaining to the specific facility. If there is an unsatisfactory inspection, then a comment is made in this data field and the facility is marked for re-inspection within four weeks of the date of initial unsatisfactory inspection. Past experience with facilities has shown that facility operators are cooperative and willing to bring facilities into compliance.

Implementation of Referral Policy

As a means to enhance interagency coordination, the Permittees may refer industrial business violations of County and/or municipal stormwater ordinances and California Water Code §13260 to the Regional Water Board, provided that Permittees have made a good faith effort of progressive enforcement under applicable stormwater ordinances. Referral to the Regional Water Board is required so that they can enforce the conditions of their permit on non-compliant industries. Every effort is taken at the local level to achieve compliance before referring a facility, including using the threat of calling in the Regional Board and their ability to levy hefty fines. It is possible that the Regional Board would be notified immediately if very egregious problems were

4.7 ENFORCEMENT– IC4

The Enforcement Control Measure outlines the progressive levels of enforcement applied to industrial and commercial facilities that are out of compliance with County and municipal ordinances and establishes the protocol for referring apparent violations of facilities subject to the Industrial Activities Storm Water General Permit to the Regional Water Board. The Enforcement Control Measure has been developed to address specific legal authority issues related to industrial and commercial facility discharges and should be implemented in coordination with the Permittees'

Performance Standard 4-7

Implement a progressive enforcement policy			
	Yes	No	N/A
Camarillo	<input checked="" type="checkbox"/>		
Ventura County	<input checked="" type="checkbox"/>		
Fillmore	<input checked="" type="checkbox"/>		
Moorpark	<input checked="" type="checkbox"/>		
Ojai	<input checked="" type="checkbox"/>		
Oxnard	<input checked="" type="checkbox"/>		
Port Hueneme			<input checked="" type="checkbox"/>
Ventura	<input checked="" type="checkbox"/>		
Santa Paula		<input checked="" type="checkbox"/>	
Simi Valley	<input checked="" type="checkbox"/>		
Thousand Oaks	<input checked="" type="checkbox"/>		

discovered at a site covered by the Industrial Activities Stormwater General Permit (IASGP). At a minimum the permit requires Permittees provide a good faith effort to bring a facility into compliance, which must be documented with:

- Two follow-up inspections
- Two warning letters or notices of violation

For those facilities in violation of municipal ordinances and subject to the IASGP, the Permittees may escalate referral of such violations to the Regional Water Board after one inspection and one written notice (copied to the Regional Water Board) to the operator regarding the violation. This is up to the discretion of the Permittee, and is only likely to be used in cases where there is a severe discharge causing or contributing to a water quality exceedance.

Such referrals are filed electronically with the Regional Water Board for any inspection that led to a notice of violation or the discovery of a non-filer. In making such referrals, Permittees are required to include at a minimum the following information in their referral:

1. Name of facility
2. Operator of facility
3. Owner of facility
4. WDID number (if applicable)
5. Industrial activity being conducted at the facility that is subject to the IASGP
6. Records of communication with the facility operator regarding the violation, which shall include at least an inspection report
7. The written notice of the violation copied to the Regional Water Board

The Permittees were able to bring all IAGSP facilities into compliance, and none were referred to the Regional Board for further enforcement.

4.7.2 Investigation of Complaints Transmitted by Regional Water Board

On occasion, Regional Board staff will receive information on an industry within a Permittee's jurisdiction that needs to be investigated in a timely manner. The Permittees implement procedures for responding to complaints forwarded by the Regional Water Board to ensure initiation of inspections within one business day. Permittees may comply by taking initial steps (such as logging, prioritizing, and tasking) to "initiate" the investigation within one business day. However, the Regional Water Board expects that the initial investigation, including a site visit, would occur within four business days. Complaint-initiated inspections include, at a minimum, a limited inspection of the facility to confirm the complaint, to determine if the facility is effectively complying with municipal stormwater urban runoff ordinances and, if necessary, to initiate corrective action.

The Permittees have (and will continue to) work closely with the Regional Water Board when a facility is identified as requiring a compliance inspection. The Permittees were able to bring all facilities into compliance that were not immediately found to be in compliance.

Table 4-2 Complaints Transmitted by Regional Water Board for Investigation by Permittees

Facility Category	Nature of Complaint	Confirmation of Complaint	Permittee Assistance and/or Corrective Action
<i>Industrial</i>			
None			
<i>Other Federally-Mandated Facilities</i>			
None			

4.7.3 Task Force Participation

The Permittees will participate in an interagency workgroup, such as the Environmental Task Force or the Storm Water Task Force, as a means to communicate information and concerns regarding stormwater enforcement actions undertaken by the Permittees. Participation in such a workgroup should facilitate communication of special cases of stormwater violations and address a coordinated approach to enforcement action.

The Ventura County Stormwater Program and Permittees, including different divisions such as CUPA or County Environmental Health, participate on the Ventura County Environmental Crimes Task Force. This task force is led by the District Attorney's office and includes representatives from different environmental agencies including the Ventura Air Pollution Control District, California EPA, and Federal EPA. The purpose is to work together to share sensitive information on enforcement activities to increase the chances of eliminating the problem.

4.8 TRAINING – IC5

The Training Control Measure is important for the implementation of the Industrial/Commercial Program Element. An effective training program is one of the best pollution prevention BMPs that can be implemented because it provides for consistency in inspections and enforcement, gives the inspector the ability to respond to a variety of situations and questions, and ultimately encourages the inspectors to initiate behavioral changes that are fundamentally necessary to protect water quality.

Each Permittee identified inspection staff and other personnel for training based on the type of stormwater quality management and pollution issues that they might encounter during the performance of their regular inspections or daily activities. Targeted staff may include those who perform inspection activities as part of the HAZMAT and wastewater pretreatment programs as well as staff who may respond to questions from the public or industrial/commercial businesses, such as those working with business licenses.

Staff was trained in a manner that provided adequate knowledge for effective business inspections, enforcement, and answering questions from the public or industrial/commercial operators. Training included a variety of forums, ranging from informal "tailgate" meetings, to formal classroom training and self-guided training methods. When appropriate, staff training included information about the prevention, detection and investigation of illicit connections and illegal discharges (IC/ID). See **Section 8** for more information regarding IC/ID training.

Performance Standard 4-8

Conduct training for key staff involved in the Business Inspection program			
	Yes	No	N/A
<i>Camarillo</i>	<input checked="" type="checkbox"/>		
<i>Ventura County</i>	<input checked="" type="checkbox"/>		
<i>Fillmore</i>	<input checked="" type="checkbox"/>		
<i>Moorpark</i>	<input checked="" type="checkbox"/>		
<i>Ojai</i>	<input checked="" type="checkbox"/>		
<i>Oxnard</i>	<input checked="" type="checkbox"/>		
<i>Port Hueneme</i>	<input checked="" type="checkbox"/>		
<i>Ventura</i>	<input checked="" type="checkbox"/>		
<i>Santa Paula</i>	<input checked="" type="checkbox"/>		
<i>Simi Valley</i>	<input checked="" type="checkbox"/>		
<i>Thousand Oaks</i>	<input checked="" type="checkbox"/>		

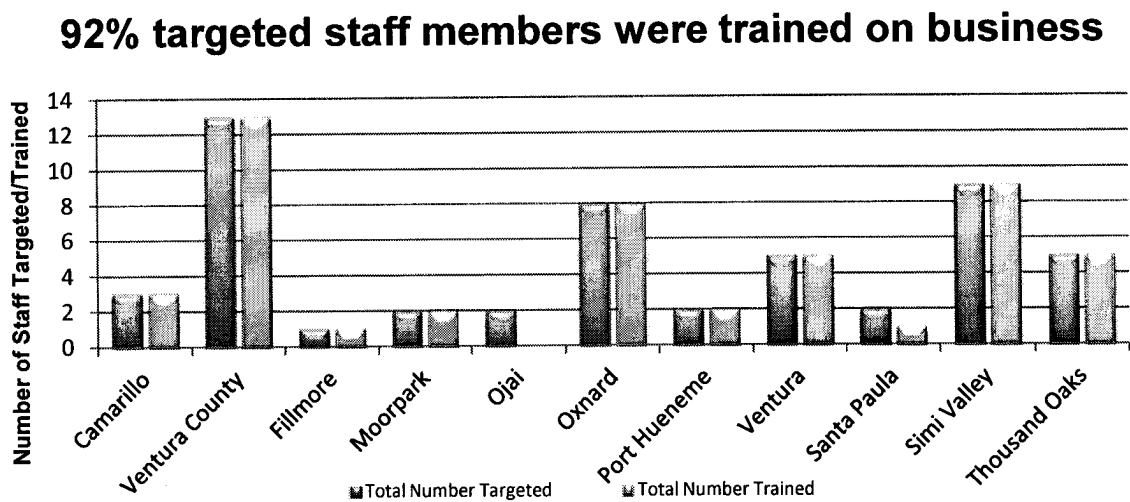
During this reporting period, the Permittees trained 49 inspection staff in stormwater pollution prevention.

Figure 4-14 IC/ID Training depicts the number of staff trained in the program area for each Permittee. Some agencies contract out their inspections to trained consultants and therefore did not target any of their employees.

Table 4-3 Training Areas of Focus for the Industrial/Commercial Program Element

Target Audience	Format	Subject Material	Comments
<ul style="list-style-type: none"> Industrial/Commercial inspectors County Health restaurant inspectors 	<ul style="list-style-type: none"> Classroom Field Demos 	<ul style="list-style-type: none"> Overview of stormwater management program Stormwater ordinance and enforcement policy BMPs for facilities Facility inventory tracking 	<ul style="list-style-type: none"> Training seminars or workshops related to the program may be made available by other organizations

Figure 4-14 IC/ID Training



4.9 EFFECTIVENESS ASSESSMENT – IC6

Effectiveness assessment is a fundamental component required for the development and implementation of a successful stormwater program. In order to determine the effectiveness of the Industrial/Commercial Facility Program Element, a comprehensive assessment of the program data is conducted as part of the Annual Report. The results of this assessment are used to identify modifications that need to be made to the Program Element. Each year the effectiveness assessment is reviewed and revised as necessary.

By conducting these assessments and modifying the Program Element as necessary, the Permittees ensure that the iterative process is used as an effective management tool. Due to the types of data collected for the Industrial/Commercial Facility Program, current and future assessments will primarily focus on Outcome Levels 1 and 2 though behavior changes can be seen as a reduction in discharges is observed and the need for enforcement drops.

- Outcome Level 1 (L1) answers the question: Did the Permittees implement the components of the Permit?
- Outcome Level 2 (L2) answers the question: Can the Permittees demonstrate that the control measure/performance standard significantly increased the awareness of its target audience?
- Outcome Level 3 (L3) answers the question: Can the Permittees demonstrate that the control measure/performance standard changed a target audience's behavior, resulting in the implementation of recommended BMPs?

The following is an assessment regarding the effectiveness of the Industrial/ Commercial Program.

4.9.1 Facility Inventory Maintain and Annual Update Inventory

All Permittees maintain an inventory of industrial and commercial facilities. Permittees have begun to inspect facilities with the goal of completing all initial inspections by July 8, 2012 and inspecting facilities twice during the permit term. Initially inspections focused on industrial facilities, auto dealers, auto service shops, laundry facilities, nurseries and restaurants. (L1)

4.9.2 Inspection

Initial inspections were performed by this reporting year. Some Permittees initiated inspections over the 2009-10 reporting periods and continued them through the 2011/12 period to meet this deadline. (L1) Permittees conducted 115 follow-up inspections as needed to ensure compliance. Since the Permit adoption over 5600 inspections were conducted Countywide (L2).

The Permittees have reviewed and revised their inspection checklists, as necessary to be consistent with the permit. (L1)

4.9.3 Industrial/Commercial BMP Implementation

BMP Fact Sheets and Selection

Industrial and commercial BMP Fact Sheets were developed and are available at the Ventura Countywide Stormwater Quality Management Program website. (L1)

Distribute BMP Fact Sheets

Permittees that have initiated an inspections program distribute fact sheets as part of the inspection process. (L1)

4.9.4 Enforcement

Implement Progress Enforcement and Referral Policy

The Permittees have a progressive enforcement and referral policy so that enforcement actions match the severity of a violation and include distinct, progressive steps introduced to bring a facility into compliance. (L1)

Implementation of Industrial Referral Policy

All Permittees may refer industrial business violations to the Regional Water Board provided that Permittees have made a good faith effort of progressive enforcement. (L1)

Investigation of Complaints Transmitted by Regional Water Board

The Permittees implement procedures for responding to complaints forwarded by the Regional Water Board to ensure initiation of inspections within one business day. (L1)

Task Force Participation

The Permittees will participate in an interagency workgroup, such as the Environmental Task Force or the Storm Water Task Force, as a means to communicate information and concerns regarding stormwater enforcement actions undertaken by the Permittees. (L1)

4.9.5 Training

During this reporting period, the Permittees trained 49 staff in business inspections and enforcement. Permittees effectively trained 94% of targeted staff. (L1)

4.9 INDUSTRIAL/COMMERCIAL PROGRAM ELEMENT MODIFICATIONS

On an ongoing basis, the Permittees evaluate the experience that staff has had in implementing the program and the results of the Annual Report to determine if any additional program modifications are necessary to comply with the Clean Water Act requirement to reduce the discharge of pollutants to the MEP.

Many key modifications have been made to the Industrial/Commercial Program Element with the adoption of the new permit. Key modifications that have been made are tracking facilities by watershed, an expanded list of businesses and industries that are tracked and clearly defining how to identify those businesses and industries. Future efforts may look into the inspections or outreach to the owners of multi-tenant commercial retail areas with common trash areas.